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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY OF )  
CALIFORNIA, )  
 )  
Plaintiff, )  
vs. )  
 )  
GERALD ARMSTRONG, DOES 1 ) No. C 420 153  
through 10, inclusive, )  
 )  
Defendants, )  
 )  
MARY SUE HUBBARD, )  
 )  
Intervenor. )  
\_\_\_\_\_ )

DEPOSITION OF GERALD ARMSTRONG, taken on  
behalf of Intervenor, at 5855 Topanga Canyon  
Boulevard, Suite 400, Woodland Hills, California  
91367, at 11:25 A.M., Friday, January 14, 1983,  
before RUTH PERSKY, C.S.R., #5673, a Notary  
Public in and for the County of Los Angeles,  
State of California, pursuant to Notice.

Reported by: RUTH PERSKY, C.S.R., #5673  
Deposition No.: 83-017

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I N D E X

<u>WITNESS</u>	<u>EXAMINATION</u>	<u>PAGE</u>
Gerald Armstrong	By Mr. Litt	4

E X H I B I T S

<u>INTERVENOR'S</u>		<u>PAGE</u>
1	Copy of sealed envelope, front and back.	105

QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER

<u>Page</u>	<u>Line</u>
6	17
114	10

WOODLAND HILLS, CALIFORNIA, FRIDAY, JANUARY 14, 1983

11:25 A.M.

GERLAD ARMSTRONG

called as a witness on behalf of the Intevenor, having been first duly sworn, was examined and testified as follows:

EXAMINATION

BY MR. LITT:

Q Mr. Armstrong, I think you know, but I will say it anyway: I'm the attorney for Mary Sue Hubbard in this action. You have been deposed before, and you were present at the deposition of Mrs. Hubbard on Tuesday of this week; is that right?

A Yes.

Q So you are familiar with depositions and how they work?

A (No response.)

Q You have got to answer.

A Yes.

Q I know you have heard it before, but let me review it quickly with you anyway.

You understand that the testimony that's being taken down today will be prepared in a booklet form, and it's being given under oath, and it can be used in the same way as the testimony given in court is used; is that right?

A Yes.

1 Q And you will have an opportunity to review the  
2 testimony and make any corrections, but you also understand  
3 that if you make any corrections, they can be commented on; is  
4 that right?

5 A Yeah.

6 Q In the course of my questioning, I may ask you  
7 questions that ask for your opinion or for your best estimate.  
8 And while I don't want you to guess when I do, maybe we can  
9 facilitate things now if you will do the best you can. If you  
10 don't understand something, or if you feel you can't answer the  
11 question, just tell me, and we'll take it from there; okay?

12 A All right.

13 Q Are you under the use of any medication or drugs?

14 A No.

15 Q Is there any reason why today you are not feeling  
16 well or can't answer my questions clearly?

17 A Not yet.

18 Q All right. Mr. Armstrong, you were present on  
19 Tuesday when Mary Sue Hubbard was questioned by your attorney,  
20 and maybe we can begin today by your telling me -- and this is  
21 a broad question and do the best you can. I'm not going to  
22 hold you to all the details but tell me as best you can if  
23 there were statements made by Mrs. Hubbard that you heard in  
24 the course of her deposition that you dispute factually.

25 MS. DRAGOJEVIC: For the record, I'm going to object  
26 to the question as overbroad and calling for a narrative, but  
27 he can go ahead and answer.

28 THE WITNESS: Yes, there were.

1 BY MR. LITT:

2 Q Will you tell me what those were.

3 A There was Mary Sue's claim that she did not know  
4 that I had possession of the Hubbard archives and memorabilia  
5 and that I was using those, that I was furnishing those  
6 materials to Omar Garrison for his writing of the biography.  
7 There was her statement that I did not communicate with her  
8 during that period of time, 1980, 1981 in which I was involved  
9 in the research for the biography project.

10 There was her statement that she did not communi-  
11 cate with Omar Garrison during that period. There was her  
12 statement that the memos, dispatches, received from L. Ron  
13 Hubbard that had L. R. on the bottom originated with senior  
14 messengers and not with her husband L. Ron Hubbard. There  
15 was her statement that I stole those materials. That's what  
16 comes to mind right now.

17 Q All right. Before we get into the meat of this,  
18 let me ask a couple of quick questions for my record. What is  
19 your present address?

20 MS. DRAGOJEVIC: I'm going to object to the question as  
21 being harassment of this witness. This witness has undergone  
22 an incredible amount of harassment since this lawsuit was  
23 filed, including being followed, including having people come  
24 onto his property, including having people come to his place  
25 of business.

26 THE WITNESS: On that basis, it probably makes no  
27 difference, Julia.

28 MS. DRAGOJEVIC: And he is concerned that he not be

1 harassed any further and does not wish to give out his address.  
2 Now, as you indicated to me at the deposition of Mrs. Hubbard  
3 that at any time I wished to contact Mrs. Hubbard I can go  
4 through you, well, that's the same situation here, Mr. Litt.  
5 If you need anything regarding Jerry Armstrong or about Jerry  
6 Armstrong, you can contact me. I'm his attorney.

7 MR. LITT: Are you instructing him not to answer?

8 MS. DRAGOJEVIC: Yes.

9 MR. LITT: Are you making any representations that  
10 Mrs. Hubbard has harassed this witness in any way or anyone  
11 acting on her behalf?

12 MS. DRAGOJEVIC: I don't know the answer to that.

13 MR. LITT: You don't know the answer to whether you  
14 are making such representation?

15 MS. DRAGOJEVIC: Well, I'm not certain as of this point  
16 whether Mrs. Hubbard had anything to do with the harassment.  
17 I did note in her Complaint in Intervention that she claims  
18 damages for hiring certain investigators to apparently follow  
19 or discover information about Mr. Armstrong. So there is a  
20 potential that, yes, she was involved in that particular  
21 harassment of Mr. Armstrong, and those facts will come to  
22 light hopefully through discovery.

23 BY MR. LITT:

24 Q Are you employed?

25 A Yes.

26 Q Where are you employed?

27 A Why?

28 Q Where?

1 A Janis Burkes.

2 Q B-u-r-k-e-s?

3 A I think so.

4 Q What's her position?

5 A She's a secretary.

6 Q Anybody else?

7 A Jocelyn Armstrong.

8 Q That's your wife?

9 A Yes.

10 Q She's also employed there?

11 A Yes.

12 Q Is she a paralegal as well or a secretary or  
13 something else?

14 A Yeah.

15 Q Yeah? Which one?

16 A She's a secretary and a paralegal.

17 Q Anybody else at the law firm you work at that you  
18 have had such conversations with?

19 A No.

20 Q Are there any friends or acquaintances of yours  
21 with whom you've had conversations concerning the subject of  
22 Scientology or this lawsuit?

23 A Yes.

24 Q Can you tell me their names.

25 A David Brown.

26 Q What's your relationship with Mr. Brown?

27 A He's my brother-in-law.

28 Q Do you know his address?

1 A No.

2 Q Do you have a record of his address somewhere?

3 A Yes. Just so it's on the record, I personally  
4 object to this stuff strenuously and the reason -- and it's  
5 well known that this organization has involved itself in  
6 harassment of individuals whom it deems are an opponent or  
7 antagonistic to the organization, and I feel that by my doing  
8 this now, by giving this information, I'm putting them at risk.  
9 So I'm giving it to you on that basis, and you are contributing  
10 to it because this is going into their data files, their data  
11 banks, and there's no doubt in my mind that those people will  
12 be contacted, harassed, and attempts will be made to get me  
13 thrown off my job and so on. The evidence is very clear in  
14 that direction. So we can continue, but I just want you to  
15 know where I'm coming from, and I think it's also very evident  
16 that your client spearheaded this organization for so many  
17 years, and that it continues to this day, and there's no doubt  
18 of that. So I'm giving this to you on that basis.

19 MR. LITT: Julia, do we have a stipulation that it's  
20 not necessary to make motions to strike so I don't have to  
21 keep on bothering making motions to strike for statements that  
22 are nonresponsive?

23 MS. DRAGOJEVIC: Sure. I'll stipulate to that.

24 MR. LITT: I will state for the record, Mr. Armstrong,  
25 that I'm asking you these questions because they are for  
26 legitimate discovery purposes. There will be no harassment of  
27 anybody by my client or by myself other than making legitimate  
28 inquiries for legitimate discovery, and I will advise you that



1 before you make such charges against me or my client, that you  
2 think about it twice.

3 MS. DRAGOJEVIC: I think he thought about it quite a  
4 bit, and I would agree with him.

5 BY MR. LITT:

6 Q Do you have anything to support the fact that I  
7 have ever, acting as Mrs. Hubbard's attorney, harassed any  
8 witness in any legal proceeding?

9 A No, and I don't think that you would. I respected  
10 you the other day for the way you conducted yourself, and I  
11 respect that, and I have no doubt that you act very ethically  
12 in your position. My contention is that the information does  
13 not stop at your office and that it is well known that this is  
14 a means used by Scientology to feed their data banks. It is  
15 not what you or your client will do. It is what the others  
16 involved in this litigation or the whole campaign will do, and  
17 that's my contention.

18 Q Well, your contentions are well known and have  
19 been carried in the press on many occasions so I'm aware of  
20 what they are, and hopefully in this deposition we won't have  
21 to spend a lot of time with you repeating that. I'm quite  
22 aware of what your position in this regard is.

23 Any other friends or acquaintances?

24 A Dori Brown.

25 Q What's your relationship with her?

26 A She's married to David Brown.

27 Q She's your sister?

28 A No. She's --

1 Q I understand. Okay. Anybody else?

2 A Omar Garrison.

3 Q When was the last time you had a conversation  
4 with Mr. Garrison?

5 A Four or five days ago.

6 Q Taking the last six-month period, could you give  
7 me an estimate of approximately how frequently you have spoken  
8 with Mr. Garrison.

9 A I'd say once a week on an average throughout that  
10 period. When we were together, obviously many more times.

11 Q I take it from that answer that you have been  
12 together in the last six months?

13 A Yes.

14 Q On how many occasions?

15 A Three.

16 Q Give me the first of those if you can remember.  
17 Approximately when was that?

18 A Probably October.

19 Q And where was that?

20 A In a restaurant.

21 Q If you can remember the name of the restaurant,  
22 give me that and also give me the city.

23 A Yes, sir.

24 It was the restaurant called the Boozy Rouge,  
25 and it was in Newport Beach.

26 Q On that occasion did you only see him at the  
27 restaurant, or did you spend more time with him while he was  
28 in the city?

1 A Just that once.

2 Q When was the next occasion?

3 A Sometime in early December, I believe.

4 Q Where was that?

5 A That was in another restaurant and that was -- it  
6 was a Chinese restaurant in Costa Mesa. I don't recall the  
7 name.

8 Q And again it was just a visit in the restaurant?

9 A Yes.

10 Q And the next time?

11 A That was at New Year's.

12 Q Where was that?

13 A That was at his home.

14 Q In Salt Lake City; is that where he lives?

15 A Cedar City.

16 Q Close. How long did you visit his home?

17 A Two days.

18 Q And that's the last time you've seen him?

19 A Yes.

20 Q Any other friends or acquaintances with whom  
21 you've had such discussions?

22 MS. DRAGOJEVIC: Still within the past six months?

23 MR. LITT: Yes.

24 THE WITNESS: Bent Corydon. C-o-r-y-d-o-n, I think.

25 BY MR. LITT:

26 Q When was that discussion?

27 A Approximately a month ago.

28 Q Just one discussion?

1 A Two.

2 Q Were these in person or by telephone?

3 A By telephone.

4 Q Did you call him, or did he call you?

5 A He called me on the first occasion. I returned  
6 his call.

7 Q Anybody else?

8 A Jim Dincalci.

9 Q When was that?

10 A Two months ago.

11 Q Is that the only conversation with him in the  
12 last six months?

13 A No.

14 Q How many?

15 A Six.

16 Q Were these in person or by telephone?

17 A Both. I both met him and called him. Probably  
18 six of each.

19 Q Anybody else?

20 A Nancy Dincalci.

21 Q By telephone and in person with her also?

22 A Yes.

23 Q Same number as with Jim Dincalci?

24 A Yes.

25 Q Anybody else?

26 A Mike Douglas.

27 Q On how many occasions?

28 A One.

1 Q In person or by telephone?  
2 A In person.  
3 Q Anybody else?  
4 A Kima Douglas.  
5 Q Same thing, once in person?  
6 A Yeah.  
7 Q Anybody else?  
8 A Tony Armstrong.  
9 Q On how many occasions?  
10 A Three.  
11 Q Telephone or in person?  
12 A Telephone.  
13 Q What's your relationship to Tony Armstrong?  
14 A We're brothers.  
15 Q Anybody else?  
16 A Martin Samuels.  
17 Q On how many occasions?  
18 A Twice.  
19 Q In person or by telephone?  
20 A Telephone.  
21 Q What's your relationship with him?  
22 A (No response.)  
23 Q How do you know --  
24 A He called me.  
25 Q Did you know him before he called you?  
26 A Just the name.  
27 Q Did he at one time have a connection to  
28 Scientology?

1 A Yeah. I guess he still does.

2 Q Anybody else?

3 A Brown McKee.

4 Q On how many occasions?

5 A Once.

6 Q In person or by telephone?

7 A Telephone.

8 Q Anybody else?

9 A I guess that's it.

10 Q Mr. Armstrong, I know that you have been deposed  
11 in this case before, and while on the one hand I will try not  
12 to spend needless time having you repeat things that you've  
13 already testified to, to some extent I need to go back over  
14 some things that you have testified about.

15 When did you join Scientology?

16 A I don't know.

17 Q Approximately.

18 A I couldn't tell you within a million years. I  
19 have no idea of when it happened. I don't know even if I did  
20 join. How does one join? What is it? I have no idea. I  
21 can't answer. How does one become a member? When one reads  
22 a book? I don't know.

23 Q Well, when did you assume a staff position?

24 A Okay. 1969.

25 Q How old were you at the time?

26 A 23.

27 Q What position was that?

28 A I gave introductory lectures.

1 Q Where?

2 A In Vancouver.

3 Q Is that where you are from originally?

4 A Near there.

5 Q And at some point did you join the ship APOLLO?

6 A Yes.

7 Q When was that?

8 A February 1971.

9 Q And in what capacity did you first serve on the  
10 ship APOLLO?

11 A In the galley.

12 Q Were you on the ship continuously other than  
13 vacations or whatever until 1975?

14 A Yes.

15 Q And as best you can recall, why don't you tell me  
16 the different positions you held while you were on the ship.

17 A After the galley I was on the deck force; I  
18 became the driver of the ship's car; I became the ship's  
19 representative; I became the intelligence officer for the ship.  
20 That was it.

21 Q Did you hold the position of intelligence officer  
22 as your last position?

23 A Yes.

24 Q How long did you hold that position?

25 A Approximately a year.

26 Q What were your duties in that position?

27 A Gather information and had liaison with the  
28 Guardians Office on board the ship.

1 Q Anything else?

2 A That was principally it.

3 Q Did you have somebody who was immediately senior  
4 to you when you held that position?

5 A Two actual seniors. One was an organizational  
6 senior, and one was an actual senior. The latter was Brian  
7 Roubinek.

8 Q What was the former?

9 A John Danilovich.

10 Q And were Mr. and Mrs. Hubbard on board ship while  
11 you were on board ship?

12 A Much of the time.

13 Q Describe for me the personal contact you had  
14 with them during that period, either of them.

15 A I saw them quite frequently, often on a daily  
16 basis.

17 Q Are you thinking, or am I supposed to ask another  
18 question? I can't tell whether you are done with your answer  
19 or not.

20 A I was going over the amount of time I spent with  
21 them so --

22 Q Okay.

23 A Go ahead and ask your question.

24 Q No, I was just asking is that the only contact that  
25 you had during that period that you saw them on a daily basis?

26 A It really varied. I wrote to both of them  
27 many times from my position; I talked to them both many times  
28 from my position; I translated for Mr. Hubbard. That's mainly



1 it.

2 Q When you say "translated," tell me what you mean.

3 A Oh, he had -- when his tailor or barber, local  
4 Portuguese people came on board, they used me for translating.

5 Q You would translate from Portuguese to English?

6 A Yeah.

7 Q Give me an estimate of how often you would have  
8 direct conversations with either of them. We're still  
9 referring to the ship period here.

10 A Perhaps 50 times throughout that period.

11 Q With each, or is that --

12 A More with him than with her.

13 Q Were these generally brief conversations about  
14 some duty that you had or something like that?

15 A Yes. Generally, yes.

16 Q Were there any occasions on which you had extended  
17 conversations with either of them?

18 A Yes.

19 Q Can you recall those.

20 A On those occasions when I translated for him, I  
21 spent sometimes hours with him. I spent some time with him  
22 discussing port situations. A couple of times when we went  
23 into a new port, he wanted to know about certain things and  
24 certain strategies.

25 MS. DRAGOJEVIC: Why don't we let the record reflect  
26 that Howard J. Stechel, attorney for the Church of Scientology  
27 of California has just entered the room.

28 THE WITNESS: That was principally it.

1 BY MR. LITT:

2 Q In the conversations where you translated, were  
3 those conversations between you and Mr. Hubbard, or what was  
4 your basic function on those occasions? To translate conversa-  
5 tions which he was having with a third party?

6 A It was basically with a third party, and around  
7 that we would talk about things.

8 Q Where did you go when you left the ship?

9 A Final time?

10 Q I'm sorry. Say that again. Yes, at the end.

11 A To Canada.

12 Q Was that on a vacation?

13 A Yes.

14 Q And at some point did you return to a position  
15 within the Church?

16 A Yes.

17 Q When was that?

18 A In November -- October or November of 1975.

19 Q And where did you go then and what position did  
20 you assume?

21 A I was in B-1 of a small Guardian Office which was  
22 set up in Daytona Beach.

23 Q And when the Church moved to Clearwater, did you  
24 remain in that position?

25 A No.

26 Q Did you move to Clearwater with the Church?

27 A No.

28 Q Where did you go?

1 A To Dunedin.

2 Q What position did you hold in Dunedin?

3 A I was in the LRH External Communications Bureau.

4 Q How long did you hold that position?

5 A Six months.

6 Q What did your post entail? What were your duties?

7 A The relay of Telexes and correspondence between  
8 L. Ron Hubbard, Mary Sue Hubbard, the Guardians Office, and  
9 various Scientology organizations.

10 Q When you say "the relay," you mean you would enter  
11 it onto the Telex or take it off the Telex?

12 A Yeah, both. Coding and decoding, the typing, the  
13 setting up into form for receipt decoded.

14 Q And how much personal contact did you have with  
15 Mr. Hubbard during that period?

16 A Throughout December, January, February, consider-  
17 able personal contact.

18 Q Of what type?

19 A I saw him on a daily basis. Our offices adjoined.

20 Q During that period did you have any conversations  
21 with Mr. Hubbard?

22 A Yes.

23 Q Approximately how many?

24 A Perhaps 10. That's in addition to the daily  
25 hi-how-are-you routine.

26 Q And were these conversations related to some job  
27 responsibility that you had?

28 A Some of them, yes.

1 Q Well, let's take the "some" of them. Were those  
2 fairly brief conversations as best you recall?

3 A Most of the conversations were fairly brief.

4 Q The conversations that weren't related to your  
5 job responsibilities, do you remember the nature of them?

6 A A couple of them.

7 Q Tell me about them.

8 A He talked about the setting-up of the base in  
9 Clearwater and how the Guardians Office was messing it up, and  
10 how he was having to work over Christmas when no one else had  
11 to work, and he was having to carry out the establishment of  
12 the base in Clearwater single-handedly, and principally that's  
13 really it that one time -- a couple of times.

14 Q How long did that conversation last?

15 A Half an hour.

16 Q Any other conversations you recall?

17 A We talked about radios, took me into his office  
18 and showed me his electronic gear and how it all operated and  
19 that sort of thing.

20 Q How about Mrs. Hubbard? Did you have any conver-  
21 sations with her during the six months that you were in  
22 Dunedin?

23 A Yes.

24 Q Approximately how many occasions?

25 A Other than the fairly daily "hello," probably  
26 three.

27 Q Were those related to your job responsibilities?

28 A Yes.

1 Q Were they brief?

2 A Yeah.

3 Q Did you have a person who was above you when you  
4 held this post in LRH External Communications?

5 A Yes.

6 Q Who was that?

7 A To begin with, Mike Douglas.

8 Q Anybody else?

9 A Ken Urquhart, U-r-q-u-h-a-r-t.

10 Q Anybody else?

11 A No.

12 Q Is that the same Mike Douglas that you mentioned  
13 earlier?

14 A Yes.

15 Q Since you left the Church, have you only had one  
16 conversation with Mike Douglas, the one you described, or have  
17 there been others earlier than the six months that I was asking  
18 you about?

19 A Yeah, earlier.

20 Q How many earlier?

21 A Three.

22 Q And in the course of what I take it is a total  
23 of four conversations since you left the Church, have you had  
24 discussions with him about your respective experiences with  
25 Scientology?

26 A Yes.

27 Q And do you consider him to be an accurate source  
28 of information about those experiences?

1 MS. DRAGOJEVIC: Do you mean an accurate source of his  
2 own experiences?

3 MR. LITT: Yes. In other words, Mr. Armstrong contends  
4 that people who are presently associated with the Church, he  
5 appears to contend that you can't rely on what they say. So I'm  
6 trying to see if there are any people who he agrees are  
7 reliable sources of information since anyone associated with  
8 the Church, according to him, is not. And that's my question.

9 THE WITNESS: I could answer this by saying that what  
10 he has -- what we've talked about to this date, it appears from  
11 what I've seen that he was accurate in his statements.

12 BY MR. LITT:

13 Q After you left Dunedin, where did you go?

14 A To Culver City.

15 MR. STECHEL: Is there a year that we have on this,  
16 where we are?

17 MR. LITT: Yes. We're now, I take it, in about June of  
18 1976.

19 THE WITNESS: Yes.

20 MR. STECHEL: Thank you.

21 BY MR. LITT:

22 Q And how long were you in Culver City?

23 A A week or 10 days.

24 Q Were you acting in some position while you were  
25 there?

26 A Yes. I set up a staging area for the Hubbard --  
27 Mr. and Mrs. Hubbard, their External Communications Bureau.

28 Q And you completed that task within a week to 10

1 days?

2 A Yes.

3 Q And then where did you go?

4 A Then I went to Fifield Manor.

5 Q And did you have a position there?

6 A Yes.

7 Q What was that?

8 A I was a prisoner. Mr. Hubbard ordered me locked  
9 up, and I was kept there for about three weeks under guard.

10 Q Did you have a designation within the Church as  
11 to what your status was?

12 A Perhaps "suppressive person."

13 MR. STECHEL: I want to clarify. This was June of 1976;  
14 is that right?

15 MR. LITT: That is right.

16 THE WITNESS: Yes.

17 MR. STECHEL: The alleged imprisonment?

18 THE WITNESS: The imprisonment.

19 MR. STECHEL: The alleged imprisonment.

20 BY MR. LITT:

21 Q Is that the only designation that you know of?

22 A They still called me by name. I don't know what  
23 else I could have been at that point.

24 Q Well, were you in the RPF at that time? Is  
25 that --

26 A No.

27 Q How long did you spend at Fifield Manor?

28 A Approximately three weeks.

1 Q Was there any written order issued by Mr. Hubbard  
2 that you are aware of concerning your status?

3 A I was told there was.

4 Q By whom?

5 A Dick Wiegand.

6 Q Anybody else?

7 A Much later by Janice Gillham.

8 Q What was the information that you received as to  
9 why you were placed in this status at Fifield Manor?

10 A It was deemed that I might be a threat and that  
11 I might leave and blow the security of the Culver City location.

12 Q Dick Wiegand told you that?

13 A Yes.

14 Q What did you do while you were at the Fifield  
15 Manor?

16 A For the most part I stayed in the room.

17 Q Anything else?

18 A Yeah. After the first approximately 10 days, I  
19 was taken out on a daily basis, and I was taken to UCLA library,  
20 and I was watched by some B-1 personnel while I went through  
21 microfilm, gathering information on people who were deemed  
22 enemies of the organization. I was ordered to -- we made  
23 copies, and I was ordered that part of the penance was that I  
24 had to pay for everything myself, and this went on for approxi-  
25 mately two weeks.

26 Q You did all those things?

27 A I did them all.

28 Q And when you left Fifield Manor, where did you



1 go?

2 A I went to Clearwater.

3 Q What status or position did you have there?

4 A I was assigned by L. Ron Hubbard to the RPF --

5 MR. STECHEL: To the what?

6 MS. DRAGOJEVIC: RPF.

7 MR. STECHEL: Oh, thank you.

8 BY MR. LITT:

9 Q And how long did you spend in the RPF?

10 A 17 months.

11 Q And how do you know you were assigned this status  
12 by Mr. Hubbard?

13 A I saw the Telex which came from him to Ken  
14 Urquhart.

15 Q Do you remember what it said?

16 A "Jerry and Terri Armstrong are assigned to the  
17 RPF. They" -- something about the Guardians Office. It was  
18 like we were critical of the Guardians Office, something like  
19 that. We became critical of the Guardians Office or I was  
20 critical of the Guardians Office and Terri went into agreement  
21 with me. Something like that.

22 Q And the 17 months you were in the Guardians  
23 Office, did you have any functions that you carried out?

24 A I wasn't in the Guardians Office for 17 months.

25 Q I'm sorry. The RPF.

26 A I was -- to begin with, there was only Terri and  
27 myself. After approximately a week, I became the post called  
28 the RPF Bosun.

1                   And that lasted for approximately a month till  
2 an order came down apparently from L. Ron Hubbard, removing me  
3 from the bosun post and assigning me -- I was just to be an  
4 RPF member. I continued as an RPF member for approximately  
5 five months, and then I again became the RPF Bosun. I continued  
6 in that position for the next 11 months.

7                   Q       And the order that you referred to, removing you  
8 from your first position as bosun, RPF Bosun, on what did you  
9 base the fact that this came from Mr. Hubbard?

10                  A       I was told that.

11                  Q       By whom?

12                  A       By Margie Vannier.

13                  Q       Who was she?

14                  A       She had some organizational position over the  
15 RPF.

16                  Q       And is that the sole source of your knowledge or  
17 information that Mr. Hubbard made that change?

18                  A       There was a mission which was sent -- there were  
19 these things called LRH missions. And LRH mission was a mission  
20 which was operated by L. Ron Hubbard into any organization  
21 anywhere on the planet. There was an LRH mission at that time.  
22 On that LRH mission was David Miscavige and Sue Pomeroy, and  
23 this was part of their handling. So it was described to me  
24 in that way by Margie Vannier and another person, Barbara Price,  
25 who at that point was over the RPF organization as well, that  
26 it came down from Hubbard to that mission. I was not being  
27 hard enough on the RPF members.

28                  Q       When you were a member of the RPF, what were your

1 duties and functions?

2 A Cleaning, doing the garbage, stripping sidewalks,  
3 scraping the walls, sweeping the garage.

4 Q And when you were a bosun, what was your func-  
5 tion?

6 A I had to get everyone else to do it.

7 MR. STECHEL: I move to strike the portion of the  
8 testimony regarding the allegation that he was not being hard  
9 enough on the RPF members. It didn't appear where that came  
10 from anywhere other than his own speculation.

11 THE WITNESS: And I will say that I was told that. So  
12 it did not come from my imagination.

13 MR. STECHEL: I move to strike it as hearsay.

14 MS. DRAGOJEVIC: I move to reinstate.

15 MR. STECHEL: I move to strike it as hearsay.

16 MS. DRAGOJEVIC: I move to reinstate.

17 MR. STECHEL: I move to strike for purposes of trial.  
18 It is inadmissible as hearsay.

19 MS. DRAGOJEVIC: It's not a proper objection during a  
20 deposition.

21 MR. STECHEL: Oh, yes, it is.

22 BY MR. LITT:

23 Q During the period of time that you were in the  
24 RPF, did you have any personal contact with Mr. and Mrs.  
25 Hubbard?

26 A No.

27 Q At some point did you leave the RPF?

28 A Yes.

1 MR. STECHEL: I move to strike that as being scurrilous  
2 and improper. I have as much right to make comments on the  
3 record as you do.

4 MS. DRAGOJEVIC: I haven't said anything about that.  
5 Go ahead and speak.

6 MR. STECHEL: Suffice it to say you try to disregard  
7 my remarks, I think that's very inappropriate to say that on  
8 the record. I don't think you should do that ever again.

9 MS. DRAGOJEVIC: I do what I please.

10 MR. STECHEL: You obviously do what you please, but  
11 that doesn't make it proper.

12 BY MR. LITT:

13 Q During the time that you were in the RPF, did you  
14 take any vacations?

15 A No.

16 Q Were you in Clearwater all of the time you were  
17 in the RPF?

18 A Yes.

19 Q Did you --

20 A Are we going chronologically at this point?  
21 You are trying to say something here, but to get --

22 Q Mr. Armstrong, I will ask the questions. You  
23 answer them. If you don't understand the question, just tell  
24 me, and I will try to make sure you understand it. When your  
25 lawyer questions you, she can do it in whatever order she  
26 chooses. Those are the rules of the game.

27 A I just know the way this stuff gets used so let  
28 me explain something.

1 Q No question pending.

2 A I was in the RPF two times. We're talking about  
3 the first time?

4 Q We're talking about the period we have been  
5 describing.

6 A Good.

7 Q We'll get to the second time.

8 During this same period -- so that we're clear  
9 and there's no confusion, I take it this is from approximately  
10 the middle of 1976 to the end of 1977; right?

11 A Yes.

12 Q Did you have any communication with family or  
13 friends during any of that period?

14 A Yes.

15 Q Who was that?

16 A I talked to -- I wrote to my family.

17 Q Your parents?

18 A Yes.

19 Q Brothers and sisters?

20 A Yes.

21 Q Did they write you?

22 A Yes.

23 Q Did you talk to any of them on the telephone?

24 A I don't believe so.

25 Q Were your letters read by someone else before  
26 they were sent out?

27 A Yes.

28 Q Who?

1           A       By the RPF MAA or someone acting for him,  
2 Deputy MAA, by the security guards in Clearwater.

3           Q       Do you have any more particular designation for  
4 these people than security guard?

5           A       They were called security guards.

6           Q       Do you know who they were?

7           A       Do you mean by that names?

8           Q       Yes.

9           A       I don't recall at this time.

10          Q       How long did you act as proofreader for the CMO?

11          A       Approximately a week.

12          Q       Then were you given some other assignment?

13          A       Yes.

14          Q       What was that?

15          A       I was transferred to Los Angeles.

16          Q       Where in Los Angeles?

17          A       In the Cedars Complex.

18          Q       What post?

19          A       It was in the CMO. I don't know if there was a  
20 post designation.

21          Q       What were your duties and functions?

22          A       To assist in the establishing of the CMO office  
23 and assist with a mission to get L. Ron Hubbard's movie manu-  
24 script REVOLT IN THE STARS sold.

25          Q       And how long did you hold that position?

26          A       Approximately a week.

27          Q       And then what position did you assume?

28          A       Then my wife and I went on holidays just at

1 Christmastime.

2 Q This is Christmas 1977?

3 A Yes.

4 Q Where did you go?

5 A To Canada.

6 Q To see your family?

7 A Yes.

8 Q Was this at your parents' home?

9 A Yes.

10 Q How long was this holiday?

11 A Three days.

12 Q Did you fly?

13 A No. We drove.

14 Q Then did you return to Los Angeles?

15 A Yes.

16 Q Back to the Cedars Complex?

17 A Yes.

18 Q Were you given a new position?

19 A No.

20 Q You reassumed the old position?

21 A No.

22 Q Did you have some position?

23 A No.

24 Q What did you do?

25 A We waited. My wife and I waited until orders  
26 came down ordering us to meet in a particular location.

27 Q And did those orders come down at some point?

28 A Yes.

1 Q When?

2 A Within a day or so of our arrival.

3 Q And where were you to go?

4 A We went to La Quinta.

5 Q And at La Quinta were you given some position?

6 A Yes.

7 Q What position?

8 A I was -- I was building sets, building props and  
9 sets.

10 Q For films?

11 A Yes.

12 Q Did you have a post designation?

13 A I don't recall.

14 Q Under whose authority were you?

15 A L. Ron Hubbard's.

16 Q Well, was there some organizational structure  
17 into which you fit?

18 A Yes.

19 Q What was that?

20 A I worked with Jim Dincalci building sets.

21 Q What was Jim Dincalci's position?

22 A He was a sets builder.

23 Q He had no other designation?

24 A I don't know. I never saw anything.

25 Q How long did you build sets?

26 A Approximately two weeks.

27 Q Then what did you do?

28 A I became involved in setting up for filming.



1 Q How long did you work in film-related activities?

2 A Until approximately September of 1978.

3 Q At any point during that period of time, did you  
4 have any post designation?

5 A Yes.

6 Q What was that?

7 A I was the Sets In Charge.

8 Q When did that designation come about?

9 A After approximately the first month.

10 Q And did you have superiors?

11 A Yes.

12 Q Who were they?

13 A The CMO and L. Ron Hubbard.

14 Q Were you a member of the CMO?

15 A No.

16 Q But you reported to the CMO?

17 A Yes.

18 Q Was there a particular individual that you were  
19 responsible to report to?

20 A Whatever CMO happened to be on the job at the  
21 time.

22 Q On what job?

23 A Running messages for L. Ron Hubbard.

24 Q Well, did you write reports?

25 A Sometimes. Generally it was done verbally.

26 Q You would give a report as to how your work on  
27 the sets was going?

28 A Yes.

1 Q But there is no particular individual you would  
2 give it to?

3 A It varied all the time.

4 Q During this period of time from, I guess, the  
5 beginning of 1978 until September of 1978, did you perform any  
6 other functions other than film-related functions?

7 A No.

8 Q And in September of 1978, were you given some new  
9 job function?

10 A Yes.

11 Q What was that?

12 A I was assigned to the RPF by L. Ron Hubbard.

13 Q And was this an RPF that was at La Quinta?

14 A In the general vicinity, yes.

15 Q When you say in the general vicinity, was it on  
16 some other location than the location you had been staying at?

17 A Yes.

18 Q Do you remember what it was?

19 A Yes.

20 Q Tell me.

21 A It was on Monroe Street or Avenue near Indio.

22 Q And was this facility only an RPF facility, or  
23 did it have other functions as well?

24 A It had a date orchard.

25 Q Did you work in the date orchard?

26 A Yes.

27 Q For how long on this occasion were you in the  
28 RPF?

1 whoever came.

2 Q Did you perform this function of guard at the  
3 same time as you were also acting as Sets In Charge?

4 A Yes.

5 Q Did others perform the guard function?

6 A Yes.

7 Q Was there some kind of rotation?

8 A Yes.

9 Q Was there a pool of people from which the rotation  
10 was drawn?

11 A Yes.

12 Q What was that pool?

13 A I don't know the classification of it. It was  
14 just assigned.

15 Q Well, what group of people? Who were the kind of  
16 people or what groupings of people?

17 A The people from the property.

18 Q You mean everybody from the property took turns  
19 serving as a guard?

20 A I suppose potentially, yes. I don't know. I  
21 never set the list.

22 Q From what you observed did it appear to be  
23 rotated among all the different people on the property?

24 A I think all but CMO.

25 Q And how many people were there on the property?

26 A At times I think as much as 200.

27 Q How often would you perform a guard function?

28 A At some periods, particularly after I first

1 arrived, I think it was on an almost everyday basis. A little  
2 later on when more people were on the property, I think it was  
3 less frequent.

4 Q By less frequent, once a week? Once a month?

5 A I think -- it depended on the position that I was  
6 on at the time whether or not I would be assigned. I was at  
7 one point the assistant producer for the films, and during that  
8 period I believe I did not serve, and I got busted from that  
9 post, and I would serve more regularly. So it --

10 Q Well, let's exclude the assistant producer. When  
11 you didn't serve, when you were serving, excluding the time  
12 you weren't serving and excluding the initial period when I  
13 take it people were just arriving on the facility and you were  
14 doing it on a daily basis, what would the average be once the  
15 facility was fully staffed and when you were performing this  
16 function?

17 A Three times a week.

18 Q Did you have personal contact with Mr. Hubbard  
19 in the context of your guard functions?

20 A Yes.

21 Q What was that?

22 A He would go for walks, and there was always a  
23 guard accompanying him.

24 Q So on occasion you would accompany him on such  
25 walks?

26 A Yes.

27 Q Would you have any conversations with him on these  
28 walks?

1 A Very briefly.

2 Q Sort of how-are-you doing, things like that?

3 A Generally about movies.

4 Q In your film-related work, would you have conver-  
5 sations with Mr. Hubbard?

6 A Yes.

7 Q And were those conversations related to what you  
8 needed to do in whatever position you held within the context  
9 of making the films?

10 A Yes. Generally, I think so.

11 Q Any other conversations other than those type?

12 A Yeah. The other ones were brief.

13 Q How about Mrs. Hubbard during this period? Still  
14 the end of '77 to September '78.

15 A Yes.

16 Q Any conversations with her?

17 A Yes.

18 Q How many approximately?

19 A Other than hi, how are you, I believe two.

20 Q Do you remember the subject matter of either of  
21 those?

22 A We discussed how she was doing and what post I  
23 was doing and that sort of thing.

24 Q Were these brief conversations?

25 A 10, 15 minutes each.

26 Q During the period that you were in the RPF in  
27 Indio, did you have any personal contact with Mr. and Mrs.  
28 Hubbard?

1 A Very briefly.

2 Q Can you tell me the circumstances.

3 A I met them at the gate; I let them in -- that was  
4 mainly it.

5 Q On one occasion?

6 A There may have been two meetings, but they were  
7 very, very brief.

8 Q You were released from RPF when? In the summer  
9 of 1979 or earlier in the spring?

10 A Spring.

11 Q Were you assigned to some other job position at  
12 that time?

13 A Yes. I was assigned to the LRH Renovation post.

14 Q Let me go back for a moment. What is the basis  
15 of your information that Mr. Hubbard ordered you into the RPF?

16 A I saw an order.

17 Q On the second occasion?

18 A I saw an order.

19 Q Who showed you the order?

20 A I received a copy of it.

21 Q Somebody who was senior to you gave you a copy?

22 A Yes.

23 Q Do you remember what the order said?

24 A "Jerry Armstrong assigned" -- listed about six  
25 people -- "for joking and degrading."

26 Q Who were the other people mentioned?

27 A Stuart Moreau, Mike Titmus, Gary Press, Terri  
28 Armstrong. I think there was six altogether.

1 Q And one other question that I forgot to ask you.  
2 What was the size of the staff of people working on film produc-  
3 tion matters? I'm going back now to before you went into the  
4 RPF.

5 A 150.

6 Q What were your functions working on LRH  
7 Renovations?

8 A I was in charge of purchasing material for the  
9 renovations and decorations of a home for Mr. Hubbard and  
10 several offices on the Gilman Hot Springs property for him, and  
11 then I was in charge of all the renovations and the Household  
12 Unit at Gilman Hot Springs.

13 Q You were in charge of the Household Unit?

14 A Yes.

15 Q When was that?

16 A 1979.

17 Q Was that a different position than the position  
18 working on LRH Renovations?

19 A Yes.

20 Q When were you assigned to that position?

21 A Oh, it would be in the fall, summer or fall of  
22 1979.

23 Q Didn't hold any positions between LRH Renovations  
24 and the Household Unit?

25 A I don't believe so.

26 Q While you held the position in LRH Renovations,  
27 who did you report to?

28 A To Lola Rossouw or Laurel Sullivan.

1 Q What were their positions?

2 A Laurel Sullivan was LRH Renovations In Charge,  
3 and then Lola was the DCO HU.

4 Q What does that mean?

5 A She was the Deputy Commanding Officer of the  
6 Household Unit.

7 Q And who was the commanding officer?

8 A Kima Douglas.

9 Q And then you were assigned to the Household Unit?

10 A LRH Renovations was in the Household Unit.

11 Q Well, you made some distinction that you were  
12 placed in charge of the Household Unit.

13 A When Lola left the Gilman Hot Springs property,  
14 then I became the DCO HU SU, Deputy Commanding Officer of the  
15 Household Unit at SU, Special Unit.

16 Q And what were your functions there?

17 A I was still responsible for renovating the house  
18 and offices for Mr. Hubbard; I had under me the LRH Animals In  
19 Charge; I had under me the LRH Carpenter; I had under me the  
20 LRH Gear in Charge; that's LRH Steward. That's principally it.

21 Q Now, going back to La Quinta for a moment, was  
22 Mr. Hubbard living on that property that you were living on?

23 A I don't know what you mean by that question.

24 Q Well, you described that at La Quinta there was  
25 some film going on, and I take it there was a fairly large  
26 facility there; right?

27 A (Nodding.)

28 Q And you lived on that property?



1           A       I lived on three properties -- four properties  
2 there.

3           Q       Were they adjoining properties?

4           A       Some of them were.

5           Q       Well, during this period of time, where did  
6 Mr. Hubbard live, if you know?

7           A       On the La Quinta property referred to as Rifle.

8           Q       Did you live on that property during any portion  
9 of that time?

10          A       No.

11          Q       When you described that you would act as a guard,  
12 would you go over to the Rifle property to function as a guard?

13          A       Yes.

14          Q       Then going to the Gilman Hot Springs period when  
15 you came out of the RPF, was Mr. Hubbard living on the Gilman  
16 Hot Springs property?

17          A       No.

18          Q       Were you living on the Gilman Hot Springs property?

19          A       Yes.

20          Q       Do you know where Mr. Hubbard was living during  
21 that time?

22          A       I have been told that he lived in Hemet.

23          Q       Who told you that?

24          A       Mike Douglas, Kima Douglas, Warwick Alcott.

25          Q       What was the last name?

26          A       Warwick Alcott.

27          Q       And how long did you continue to hold the position?  
28 I think you said it was DCO HU.

1 A Till January of 1980.

2 Q So give it to me in months what was that? 15  
3 months? About 15 months you held that post?

4 A No, no. Maybe four, four, five months.

5 Q That's right. Okay. During the period that you  
6 held the post on renovations and DCO HU, did you have any  
7 personal contact with Mr. Hubbard?

8 A Yes.

9 Q On how many occasions?

10 A Three or four.

11 Q What was the nature of that contact?

12 A It was just a greetings, shake hands.

13 Q How-are-you kind of thing?

14 A That sort of thing.

15 MR. STECHEL: Excuse me. I didn't want to interrupt,  
16 but I want to record the showing of a motion by the Church to  
17 strike the testimony of the witness a little bit ago regarding  
18 the allegation by him that a document he claims to have seen  
19 ordered him into the RPF, a document allegedly showing that  
20 L. Ron Hubbard ordered the witness into the RPF. The grounds  
21 of the motion to strike is the best evidence rule which  
22 requires the production of the original writing before there  
23 can be any contents of any writing proven in evidence at any  
24 trial, Section 1500 of the Evidence Code. And that is the  
25 grounds for the motion to strike as well as hearsay.

26 BY MR. LITT:

27 Q After January 1980, what position did you assume

28 A I became the LRH Pers PRO Researcher. P-e-r-s

1 P-R-O Researcher.

2 Q When was the last time that you saw Mr. Hubbard?

3 A It would have been the fall of 1979.

4 Q What was the relationship between your function  
5 and what you have described in the Household Unit and the CMO?

6 A It remained the same as it was in any post any-  
7 where. The CMO could march in on orders from Hubbard and do  
8 whatever they wanted.

9 Q Was the CMO senior to you?

10 A They were senior to everyone.

11 Q My question only goes to you --

12 A Yes.

13 Q -- why don't you answer that one?

14 During the period 1979 do you have any estimate  
15 of the numbers of people in the CMO?

16 A Where?

17 Q Well, let's take Gilman Hot Springs.

18 A 30.

19 Q And people in the CMO, I take it, would have  
20 regular contact with Mr. Hubbard where he would make requests  
21 of them to carry out various activities?

22 A Yes.

23 Q They were like personal aides to Mr. Hubbard?

24 A Yes.

25 Q Were you ever a member at any time of the CMO?

26 A I don't know.

27 Q When did you think that there's a possibility  
28 that you were a member of the CMO?

1 A Perhaps in Clearwater, perhaps in Los Angeles.

2 Q In Los Angeles at the Overland property or the  
3 Culver City property?

4 A No. Prior to going to La Quinta.

5 Q When you were at the Fifield Manor?

6 A Yes -- no, at Cedars.

7 Q Cedars. Okay.

8 MR. STECHEL: In view of the witness's testimony that  
9 he doesn't know whether he was even in the CMO, the Church will  
10 move to strike as without foundation and speculation the wit-  
11 ness's earlier statement that in his opinion the CMO can march  
12 in and do whatever they want on the orders of Hubbard. That  
13 particular testimony the Church moves to strike on the grounds  
14 stated.

15 MS. DRAGOJEVIC: That has nothing to do with the testi-  
16 mony he has just finished giving.

17 MR. STECHEL: That is the motion to strike of the  
18 Church, the testimony cited a moment ago.

19 BY MR. LITT:

20 Q Is there any other period of time where you  
21 consider it a possibility that you were a member of the CMO?

22 A No.

23 Q In addition to the CMO, can you describe for me  
24 as best you can other people who, or other classifications  
25 that, were personal aides to Mr. Hubbard?

26 A His External Communications personnel.

27 Q Were there various people who had designations  
28 within that category?

1 A Yes.

2 Q What were those designations?

3 A LRH External Comm Aide.

4 Q C-o-m-m --

5 A Aide. I suppose the CO HU and DCO HU.

6 Q Well, during the period of time that you were in  
7 the DCO HU, you had contact with Mr. Hubbard on a couple of  
8 occasions where you said hello; right?

9 A Yes.

10 Q I'm not talking about that kind of thing. I'm  
11 talking about people who would work with him on a regular basis  
12 where he would have face-to-face contact with them and give  
13 them various assignments; okay?

14 A CO HU, DCO HU, External Comm Aide.

15 Whoever was in charge of his finances, that sort  
16 of thing.

17 Q Is it your testimony that DCO HU had the kind of  
18 relationship that I defined before with Mr. Hubbard?

19 A Yes.

20 Q But not while you were on that post?

21 A I was on that post at SU. If I had been on that  
22 post where he was, then it would be a different thing. If  
23 there was a DCO HU where he was, then I would consider that  
24 person an aide, and I do consider that person an aide.

25 Q When you say where he was, are you referring to  
26 the property that you heard about in Hemet?

27 A Yes.

28 Q Who else would fit that category? What other

1 designations?

2 A That's all I can think of right now.

3 Q What about within the Guardian Office structure?  
4 Would you classify any people within that structure as being  
5 personal aides of Mr. Hubbard?

6 A Certainly Mary Sue Hubbard was.

7 Q Anybody else?

8 A I don't believe so.

9 Q Now, you stated that in early 1981, January or  
10 February I guess, you got assigned to senior Pers. PRO Secretary;  
11 is that the right designation?

12 A Researcher.

13 Q Researcher.

14 A Okay.

15 Q Tell me how you came to be in that position.

16 A I petitioned L. Ron Hubbard.

17 Q What form did that petition take?

18 A I wrote to him.

19 Q And what did you do with what you had written?

20 A I put it in an out basket and it went to him.

21 Q Where was your out basket?

22 A I believe the out basket that I used was in the  
23 carpenter shop.

24 Q And somebody picked it up at some point?

25 A Yes.

26 Q Do you know who?

27 A No.

28 Q Do you know what happened to it after that?

1 A It had LRH.

2 Q Next to the approved line? Next to the approved  
3 line?

4 A Go back to your question.

5 Q My question: did you get back --

6 A Did you say did I ever get anything back?

7 Q I'm referring now to the petition.

8 A Okay. I thought you said did I ever get anything  
9 back.

10 Q No, it was specific to the petition.

11 A All right. So, no.

12 Q And the response that you received to your  
13 petition, how was the salutation at the end? What form did it  
14 take?

15 A LR.

16 Q Which you took to mean "Love, Ron"?

17 A Yes.

18 Q And did this response indicate to you that you  
19 were responsible in carrying out your staff functions to report  
20 to anybody? In other words, you said that at some point you  
21 got back a response to this petition which said you could  
22 assume this post. Was there any indication who you were to  
23 report to or anything like that?

24 A I don't recall that.

25 Q Well, was there someone that, in carrying out  
26 this position, you in fact reported to?

27 A Yes.

28 Q Who was that?

1 A Laurel Sullivan.

2 Q What was her position at the time?

3 A She was the senior LRH Personal Public Relations  
4 Officer.

5 Q And during this period of time, were you still  
6 living in Gilman Hot Springs?

7 A Yes.

8 Q Did you receive any other responses to this  
9 petition other than the one you have just described?

10 A No.

11 Q And what is your understanding of what your job  
12 function was in assuming this position?

13 A I was to assemble documentation for a biography  
14 to be written about L. Ron Hubbard.

15 Q Who was writing the biography?

16 A We did not have a writer.

17 Q Well, were you aware of the existence of some plan  
18 to try to obtain a writer?

19 A Yes.

20 Q How did you become aware of that?

21 A I knew about that in conversations with Laurel  
22 Sullivan.

23 Q And in the petition what were your reasons for  
24 suggesting that you be assigned to this post?

25 A It was an area in which I had a lot of interest.  
26 I felt that I was fairly good at research-type activities. I  
27 had already put in about nine years of service. That's about  
28 it.



1 Q And I take it that you felt that you could assist  
2 in bringing about this biographical project by your participa-  
3 tion?

4 A Yes.

5 Q And also assist in gathering various materials  
6 to be displayed concerning Mr. Hubbard's life and work?

7 A Yes.

8 Q And were you enthusiastic about the project at  
9 the time?

10 A Yes.

11 Q Did you feel that it would be of value to  
12 Scientology and to Mr. Hubbard's work at the time?

13 A Yes.

14 Q Were there various people that you copied in on  
15 your petition?

16 A Yes.

17 Q Do you remember who or what posts?

18 A I believe they were principally those people who  
19 were my seniors at that time -- DCO HU, CO HU, Pers PRO. There  
20 may have been more.

21 Q And would it be fair to say that you were, as you  
22 understand it, assigned to this post in order to help to  
23 develop Scientology and Mr. Hubbard's work?

24 A Yes.

25 Q That was your understanding? In fact that was  
26 your intention; right?

27 A Yeah.

28 Q You would not have been assigned to this post if

1 you were not a Scientologist; correct?

2 A I can't say that.

3 Q Give me your opinion based on your experience.

4 A (No response.)

5 Q You can't give an opinion?

6 A No. I think that any outsider could have done  
7 it just as well.

8 Q No. I'm not asking whether you could have per-  
9 formed it. I'm asking whether you would have been assigned  
10 to it.

11 A I don't know.

12 Q Well, let me ask you a question: do you know of  
13 anybody who was ever assigned to a position within the  
14 Scientology structure that was not a Scientologist?

15 A Omar Garrison who's writing the book.

16 Q No, no, no. Do you have any information that  
17 Omar Garrison was assigned to a Scientology post?

18 A Oh, if it were a Scientology post, then it would  
19 have to be a Scientologist.

20 Q Well, this was a Scientology post, wasn't it?

21 A It was a brand new thing.

22 Q Did you consider it a Scientology post?

23 A Yes. But it need not have been. That's all I'm  
24 saying.

25 Q Mr. Armstrong, answer my question. As I told you  
26 before, your lawyer will have an opportunity to ask you what-  
27 ever she wants at the time.

28 You considered it a Scientology post; is that

1 correct?

2 A Yes.

3 Q You petitioned for it on the basis of your  
4 experience of what procedure one would go through to try to  
5 get assigned within the Scientology structure to such a post;  
6 is that correct?

7 A Yes.

8 Q And in all the years you were in Scientology, you  
9 never observed anyone who was not a Scientologist get assigned  
10 to a Scientology post; correct?

11 A Correct.

12 MR. STECHEL: The Church wants to strike the portion of  
13 the answer of the witness where he said, "It need not have to  
14 be," everything after the statement that he considered it to  
15 be a Scientology post, the phraseology after that "but it need  
16 not have been," those words the Church moves to strike on the  
17 grounds that it is not responsive to the question that was  
18 asked at that time; and in view of the subsequent answers of  
19 the witness, it is also speculation and a sham.

20 BY MR. LITT:

21 Q You were transferred from one position within the  
22 Scientology structure to another position within the  
23 Scientology structure after your petition was granted; is that  
24 correct?

25 A Yes.

26 Q And when you say that your intention was to  
27 develop Scientology, would it be fair to say that what that  
28 means is that things that would be highly critical of

1 Mr. Hubbard would not have been considered in your mind at the  
2 time to fit within that category?

3 A I don't know.

4 Q Well, without belaboring the statements that you  
5 have made to the press recently, would you have considered at  
6 the time such sentiments to be the development of Mr. Hubbard's  
7 work and of Scientology?

8 A Give me that --

9 MS. DRAGOJEVIC: I don't understand that question. you  
10 BY MR. LITT:

11 Q You have stated to the press that Mr. Hubbard  
12 was a fraud, gone on at various lengths. I don't have to tell  
13 you what you said; you know it better than I do. At the time  
14 of this petition, would you have considered such sentiments to  
15 be in the furtherance of the development of Scientology and of  
16 Mr. Hubbard's work?

17 A No.

18 Q So the point is that you understood that in your  
19 being assigned to this post you were trying to help Scientology  
20 and Mr. Hubbard?

21 A Yes.

22 Q And you understood that, obviously, if that wasn't  
23 your intention, you wouldn't have been assigned to this post?

24 A Yes.

25 MR. LITT: All right. Let's go off the record.

26 (Lunch recess.)

27 ///

28 ///

## AFTERNOON SESSION

3:00 P.M.

## EXAMINATION (RESUMED)

BY MR. LITT:

Q Mr. Armstrong, let me go back for a couple of minutes just to cover a couple of things that we have discussed already. I believe you indicated in your testimony before the lunch break that you saw an order assigning you to the RPF on the second occasion which a senior of yours showed you; do you recall that? Am I correct, or am I remembering wrong?

A The RPF Bosun showed me, yes.

Q Could you tell me who that was. I don't think I asked you.

A That was Bill Lazaroni.

Q Anybody else involved in that or just the two of you?

A He was the one who showed me.

Q Also you indicated that, I believe, it was toward the end of 1977 that you and your wife took a holiday for three days. Any other holidays that you took over the next four years?

A Yes. In probably October of 1978.

Q Where were you assigned at that time?

A I was in the RPF at that time.

Q You and your wife took a holiday together?

A Yes.

Q Where did you go?

A To Canada.

1 Q How long did you stay there?

2 A Three weeks -- two weeks.

3 Q I take it you returned voluntarily to the RPF?

4 A Yes.

5 Q Any other holidays?

6 A With that wife you mean?

7 Q No.

8 A Okay.

9 Q With you.

10 A Yes.

11 Q When else?

12 A In 1979.

13 Q Do you remember approximately when?

14 A Perhaps the summer.

15 Q And where did you go that time?

16 A To Canada.

17 Q And who did you go with?

18 A Alone.

19 Q And how long did you stay in Canada?

20 A About two weeks.

21 Q You visited your family again?

22 A Yeah.

23 Q And again you returned voluntarily to --

24 A Yes.

25 Q -- to your post? What was your next vacation?

26 A In 1980.

27 Q Approximately when?

28 A In the summer.

1 Q Did you go to Canada again --

2 A Yes.

3 Q -- to visit your family?

4 A Yes.

5 Q How long --

6 A Approximately two weeks.

7 Q Any other vacation?

8 A Beg your pardon?

9 Q Any other vacations?

10 A No.

11 Q And when you took your three-day holiday that you  
12 described earlier today, did you return voluntarily from that  
13 holiday?

14 A Yes.

15 Q Prior to the time that you left Scientology --  
16 which I take it was in December of 1981?

17 A Yes.

18 Q -- did you ever report to any authorities that  
19 you had ever been held a prisoner or kidnapped or anything like  
20 that?

21 A No.

22 Q All right. One other question about our earlier  
23 discussions. You stated that you were held at the Fifield Manor;  
24 do you remember that?

25 A Uh-huh.

26 Q Was that a particular place where you were kept?  
27 Where was your room located?

28 A I believe it was on the fifth floor.

1 Q Was it a single room, or were there other people  
2 also living in that room?

3 A Single room.

4 Q And I believe your testimony was that there were  
5 guards who were responsible to watch you?

6 A Yes.

7 Q Can you tell me who they were?

8 A I don't recall their names. They were B-1  
9 personnel. One of them was from Denver, and the other was, I  
10 believe, from Phoenix or Nevada -- Phoenix or Las Vegas, but  
11 I'm not sure. I know they were both from out of state.

12 Q What about when you were going to do this micro-  
13 filming at the library. Do you remember the guards were with  
14 you then. Were those the same people?

15 A There were three or four who were assigned around  
16 the clock.

17 Q Do you remember any of their names?

18 A I don't remember the names.

19 Q Were the two people that you've just described  
20 among the three or four, or were they different?

21 A No, they were part of the people who were assigned

22 Q Now, tell me about the post, talking now about  
23 the senior Pers PRO Researcher post. After you assumed that  
24 position, what steps did you take to begin to carry it out?

25 A I began to assemble material connected with L. Ron  
26 Hubbard.

27 Q And how did you go about trying to assemble such  
28 material?



1           A        I went -- I found a number of boxes which were  
2 stored on the property at that time, and I brought them over to  
3 the Public Relations Bureau.

4           Q        Where was the Public Relations Bureau?

5           A        That was in the building called the Massacre  
6 Canyon Inn. It was an office adjoining the dining room in that  
7 building.

8           Q        Was that in Gilman Hot Springs?

9           A        Yes.

10          Q        Let's take these boxes. Describe these boxes for  
11 me.

12          A        There were -- they were very old beatup cardboard  
13 boxes that -- that was it. They were beat up. They had either  
14 -- they all had old tape on them, and they were very beat up.

15          Q        How did you come into possession of these boxes?

16          A        Some before I initiated the petition. The people  
17 at Gilman Hot Springs property had been mobilized to do a  
18 vetting document destruction project, and everyone on the  
19 property was required to go through every document which he had  
20 in his possession or was in his area and ensure that there were  
21 no documents which connected L. Ron Hubbard to the Guardians  
22 Office or to the operation of Scientology or to the -- having  
23 control of organization money or to the Gilman Hot Springs  
24 property or to the La Quinta property and that he had given  
25 any orders which indicated that he was intending to reside on  
26 the property. We were required to go through our area, and I  
27 went through my own records from the DCO HU post and R Renos In  
28 Charge post.

1 At one point a girl who was our storage at that  
2 time, Brenda Black, came to me and she brought with her an old  
3 box and which she said she wanted to know about the disposition  
4 of this box, this stuff, should it be shredded. And I took a  
5 look at it and recognized that what I saw predated Dianetics  
6 and Scientology and was Mr. Hubbard's personal records. So I  
7 took the box from her and said that, no, it should not, and I  
8 asked her if there was any more like that. She said she didn't  
9 know but that possibly. So I went with her then through the  
10 R -- it was called R Storage, LRH Storage area, and I got from  
11 her another couple of boxes. In addition there was -- stored  
12 there I found the trunk of material which had to do with the  
13 GO operations investigation, et cetera, into the death of  
14 Quentin Hubbard, and at that point I went to Laurel Sullivan  
15 and informed her of what had been found and with her took the  
16 boxes which had been found, and then the old materials and the  
17 Quentin Hubbard materials were sent off to Mary Sue. So that's  
18 how I came initially into this thing.

19 Q Which old materials? The box that Brenda Black  
20 had brought out?

21 A And another couple of boxes which she and I found  
22 in going through the material, the materials which were stored  
23 on the property.

24 MR. STECHEL: Excuse me one moment. I didn't want to  
25 interrupt the long narrative, but I want the record to show the  
26 Church moves to strike out -- just to try to state it briefly --  
27 not all of the answer but all the testimony the witness just  
28 gave about what he claims everyone other than himself was

1 required to do, that is, speaking for apparently hundreds of  
2 people or scores of people being required to do certain things  
3 and look for certain documents, et cetera, et cetera. I move to  
4 strike all of that out as being without foundation or personal  
5 knowledge. I'm not willing to strike out what he says Miss  
6 Black or whatever it was said to him directly on these grounds.  
7 I would move to strike down as hearsay at the time of trial,  
8 but I did want to make the motion that I have just stated.

9 BY MR. LITT:

10 Q When you say send these materials off to Mary Sue,  
11 do you know how they were forwarded to her?

12 A No, I don't.

13 Q Do you know why they were forwarded to her?

14 A Because it was announced on the property that  
15 there was a threat of a raid on the property and that anything  
16 which connected the property to the Guardians Office was to be  
17 shredded or otherwise gotten rid of. Some material was taken  
18 and buried, and some material was taken to other locations away  
19 from the property. This was deemed by Laurel that it should be  
20 sent to Mary Sue. So --

21 Q Well, what kind of property, if you know, was  
22 buried?

23 A Some of Mr. Hubbard's records.

24 Q What kind of records?

25 A Records which had to do with the French fraud  
26 case that I know of.

27 Q Where were those records kept; do you know?

28 A These were -- at one point they were kept in the

1 CMO office.

2 Q Do you know where else they were kept? You said  
3 at one point so I don't know if that meant at some point they  
4 were kept somewhere else.

5 A Well, this was in 1980. Mr. Hubbard was not on  
6 the property. That's the only thing I know about it. Previous  
7 to then they may have been somewhere else.

8 Q All right. What other kind of property was sent  
9 to other locations? I'm not now speaking of the property sent  
10 to Mary Sue but other things.

11 A At that time the same -- during this shredding  
12 document destruction process the CMO moved from Gilman Hot  
13 Springs operation into the Cedars Complex, and they took with  
14 them files and documents which they would use or would want to  
15 protect in that area.

16 Q Do you know where these files and documents had  
17 been kept prior to their being moved to Cedars? Were they kept  
18 in the CMO offices also?

19 A Yes.

20 MR. STECHEL: I move to strike out the statement -- the  
21 witness characterizes what he thinks other personnel in the  
22 Church were trying to do with these documents that were alleg-  
23 edly taken to another location, as without foundation at this  
24 point and beyond the witness's knowledge.

25 BY MR. LITT:

26 Q Now, let me go back to the documents that were  
27 sent to Mary Sue. Were all the documents that you described  
28 that were sent to her documents taken from what you have

1 characterized as R Storage?

2 A As far as I know.

3 Q The ones that you are familiar with?

4 A As far as I know they were sent to Mary Sue.

5 Q But as far as you know they came from R Storage,  
6 all of these documents that you have described that were sent  
7 to her?

8 A Yes.

9 Q Were you familiar with R Storage prior to this  
10 time that you went into it with Laurel Sullivan?

11 A Yes.

12 Q R Storage was personal storage of a variety type  
13 of things of Mr. Hubbard; is that right?

14 A That's right.

15 Q Also Mrs. Hubbard?

16 A Yes.

17 Q Both of their possessions of various kinds were  
18 kept there and maintained there together; right?

19 A Yes.

20 Q From documents to personal records, letters, and  
21 also things like furniture and other things like that; right?

22 A Up to that point?

23 Q We're now speaking of up to that point.

24 A Up to that point, that is the point where Brenda  
25 brought these things to me, I did not know exactly what was in  
26 R Storage. I knew general basis. I went through it a lot of  
27 times, and I was required to find items on occasion for  
28 Mr. Hubbard.

1 Q That was in situations where a messenger came to  
2 you and asked you to get one thing or another for Mr. Hubbard?

3 A Or he would send a dispatch or something.

4 Q Were the only occasions on which you had gone  
5 into the R Storage prior to this situation with Laurel Sullivan  
6 when you had received such a dispatch or request from Mr.  
7 Hubbard?

8 A Either Mr. Hubbard or someone in the Household  
9 Unit.

10 Q Acting, as you understood it, on his behalf?

11 A Yes. Could be a messenger; it could be CO HU,  
12 DCO HU; it would be someone who had an interest who -- in those  
13 things.

14 Q Now, other than the materials that you have  
15 described that were removed from the R Storage and sent to  
16 Mary Sue, were there any other materials that you took out from  
17 R Storage at that time?

18 A No.

19 Q And to your knowledge nobody else took out any  
20 materials from R Storage at that time; right?

21 A What was taken out was the --

22 Q The material that you described?

23 A The Quentin materials --

24 Q I understand. You don't have to repeat the  
25 materials. I'm just asking, other than those materials you've  
26 already described, so far as you know, nothing else was taken  
27 out from R Storage at that time?

28 A Uh-huh.

1 Q Is that correct?

2 A Yes.

3 Q The materials that you removed and sent to Mary  
4 Sue, describe them for me if you can in more particularity.  
5 What was in these materials?

6 A I did not send any materials to Mary Sue.

7 Q That Laurel sent.

8 A The materials that Laurel told me were to be sent  
9 to Mary Sue consisted of materials that had to do with Quentin  
10 Hubbard's death.

11 Q What about these other boxes that were sent to  
12 Mary Sue?

13 A There were no other boxes sent to Mary Sue.

14 Q Well, were there other boxes removed from  
15 R Storage at that time?

16 A Yes.

17 Q What was done with them?

18 A Those went to the Pers PRO Bureau.

19 Q Who was that?

20 A Laurel Sullivan.

21 Q And do you know what Laurel Sullivan did with  
22 them?

23 A She kept them in the Pers PRO Bureau.

24 Q On the property?

25 A Yes.

26 Q And do you know what was in those boxes?

27 A Yes.

28 Q Tell me.

1 BY MR. LITT:

2 Q Give me the date. Is that February 1980?  
3 January 1980?

4 A Yes. February -- February 1980.

5 Q When was the next time that you went into the  
6 R Storage?

7 A Maybe a little later, March or April.

8 Q And what was your objective going into it at that  
9 time?

10 A To locate some more materials.

11 Q For?

12 A For the biography.

13 Q Had Mr. Garrison been assigned to the biography  
14 at this point?

15 A No.

16 Q So this was just in anticipation of this project?

17 A I was assembling materials from wherever there  
18 were materials. It was my job.

19 Q And did you have to go through some procedure  
20 before you could go back into the R Storage to get these  
21 materials?

22 A I checked with the DCO HU SU at that time.

23 Q Which was who?

24 A It was Leo Johnson.

25 Q Did you make a request of Brenda Black initially,  
26 or did you first talk directly with Mr. Johnson?

27 A I may have sent a copy to each of them just to  
28 let them know to see if they could find any more materials. I



1 Q Let me go back for just a moment. This first  
2 box that Brenda had come to you about and asked you about --

3 A Yes.

4 Q -- why did she come to you? Were you senior to  
5 her?

6 A Yes.

7 Q And do you know where this box had come from,  
8 this particular box that she brought to you?

9 A She told me that it had come from R Storage.

10 Q Was that the term she used?

11 A Yes.

12 Q Now, I'm still unclear. Tell me about when you  
13 next actually physically went into the R Storage.

14 A At the same time she brought me the one box.

15 Q And later after that sequence of events?

16 A Then after I was approved by Mr. Hubbard to do  
17 the biography project.

18 Q Be more specific.

19 A I would say sometime in February.

20 Q Okay. We're going around here. Did you have to  
21 gain some kind of authorization to do that, or did you just  
22 walk in?

23 A Just walked in. !

24 Q And did you remove any boxes on that occasion?

25 A Yes.

26 Q What did you remove on that occasion?

27 A I removed some more boxes containing some of the  
28 material.

1 Q From the same period?

2 A Yes.

3 Q '30s, '40s, and '50s?

4 A Yes.

5 Q Any other occasions when you physically went into  
6 R Storage?

7 A Well, there may have been one later time to again  
8 search and see if I could find anything in there. There may  
9 have been. I do recall correspondence, and at the time, the  
10 second time that we are talking about after Mr. Hubbard's  
11 approval of my petition, I made a number of trips on that one  
12 occasion. In other words, it may have taken over a two-day  
13 period. There were, I believe, 21 boxes or something like that  
14 in total of these materials. So it was -- I took them, you  
15 know, a few hundred yards each box, and so I made a number of  
16 trips and it took a while.

17 Q What did you do with these boxes?

18 A I took them to the Pers-PRO Bureau.

19 Q And who did you give them to?

20 A Laurel Sullivan.

21 Q And do you know what she did with them?

22 A They were kept in the Pers PRO Bureau.

23 Q Have you now described for me all of the materials  
24 that you removed from the R Storage at any time while you were  
25 on this post?

26 A Yes.

27 Q Have you described for me all of the materials  
28 that were sent to you by someone else from R Storage while you

1 were on this post?

2 A There was another box of materials which were  
3 sent to me by Carmen Wiese who was assembling Mr. Hubbard's  
4 photographic materials, and this box contained also early  
5 biographical materials which he sent to me.

6 Q Do you know where she got them?

7 A No, I don't.

8 Q Anything else that was sent to you from R  
9 Storage?

10 A Not that I recall.

11 Q What was the total number of boxes removed from  
12 R Storage pursuant to this effort that you have described?

13 A I recall I would say about 21, 22, 23 boxes.

14 Q At some point were these materials removed from  
15 where Miss Sullivan had placed them and taken someplace else?

16 A Yes.

17 Q When was that?

18 A That was -- I believe it would be in late February  
19 of 1980.

20 Q How many boxes were removed at that time?

21 A All of those boxes.

22 Q You had already gone into the R Storage by then?

23 A Yes.

24 Q And where were they removed to?

25 A They were removed to the Cedars Complex.

26 Q Where in the Cedars Complex?

27 A On the first floor.

28 Q Some particular office?

1 A Yes. There was an office on the east side.

2 Q Was it somebody's office? Was it somebody else's  
3 office?

4 A It was Laurel's and my office.

5 Q Did Laurel have offices both at Gilman Hot  
6 Springs and at Cedars?

7 A Yes, she did.

8 Q And were you the person who transported them?

9 A Yes.

10 Q And did you have to go through some procedure  
11 before removing them from Laurel's office at Gilman Hot Springs  
12 and transferring them to Cedars?

13 A No.

14 Q Did you get permission from anyone to do that?

15 A It was ordered by Laurel.

16 Q She initiated the order? You didn't suggest it?

17 A No.

18 Q "No" doesn't -- I'll ask it again. Did you  
19 suggest that this be done?

20 A I don't believe so.

21 Q Did Laurel initiate the idea?

22 A To my recollection, yes.

23 Q And is that where the documents were maintained,  
24 in that office, until the time that you left?

25 A No.

26 Q Were they at some point moved someplace else?

27 A Yes.

28 Q Where?

1 A To another office in the Cedars Complex.

2 Q Whose office?

3 A This was Laurel's office.

4 Q A different office? Laurel's office was moved  
5 someplace else?

6 A Yes.

7 Q All right. Other than that move, were they  
8 maintained in the same office during the time that you remained?

9 A There was movements within that one office.

10 Q Physically moving the boxes from one portion of  
11 the office to another?

12 A Yes.

13 Q Now, what other documents did you collect that  
14 were in the possession of the Church or on Church property --  
15 and I'm using "Church" broadly, any property that was  
16 Scientology property -- in pursuance of this project?

17 A Documents from Controller Archives.

18 Q When did you get documents from Controller  
19 Archives?

20 A There were two occasions. One was --

21 (Off the record.)

22 (Brief recess.)

23 THE WITNESS: One was in early 1981, maybe May or so of  
24 1981, and one was later in the year in 1981. The second  
25 occasion involved a number of -- a number of trips to  
26 Controller Archives because there was a number of documents  
27 involved.

28 ///

1 BY MR. LITT:

2 Q Had you made any efforts prior to the first  
3 occasion, May of 1981, to obtain any documents from Controller  
4 Archives?

5 A I had discussed it with Tom Vorm, but I had never  
6 actually made an attempt to obtain documents.

7 Q When did you discuss it with Tom Vorm?

8 A When I delivered a number of documents to Tom  
9 Vorm.

10 Q Give me a date as best you can.

11 A In 1980 a number of times, late 1980 and 1981.

12 Q And what had you discussed with him?

13 A That biographical information was going to be  
14 coming to me and that technical documents were going to him.

15 Q Did you ask him to provide you with biographical  
16 information that was contained in the Controller Archives on  
17 those occasions in 1980?

18 A He said that at some point I would have to come  
19 up and go through the trunks, that it was not separated out,  
20 that it was all in trunks and he had not had the time to go  
21 through and see what there was, and I at the time had plenty of  
22 documentation myself to keep me busy so I put off doing that  
23 until later in the year.

24 Q And how did it come about that in May of 1980  
25 you went into the Controller Archives?

26 A In May of 1980 I didn't.

27 Q I mean May of 1981.

28 A In May of 1981 I didn't go into Controller

1 Archives. Tom Vorm brought me some materials which he had --  
2 he said he'd gone through some trunks and that the materials  
3 which he was providing to me were non-technical materials and  
4 that he was giving them to me.

5 Q What were those materials?

6 A They were some letters between Mr. Hubbard and  
7 his family. I recall there was a -- I believe some poems and  
8 some photographic materials. There were -- there was Boy  
9 Scout books and I believe a little diary from that period.

10 Q What period?

11 A From the '20s or '30s.

12 Q The family materials that you've described, could  
13 you be more specific?

14 A No. I just recall there were letters and --

15 Q Do you recall what time period they were from?

16 A I recall that some of them were very early and  
17 they went into the '50s.

18 Q Were there letters between Mr. Hubbard and his  
19 father?

20 A Yes.

21 Q Were they letters between Mr. Hubbard and his  
22 first wife?

23 A I don't -- I don't believe so.

24 Q Were there letters between Mr. Hubbard and his  
25 second wife?

26 A I don't recall.

27 Q Were there letters between Mr. Hubbard and Mary  
28 Sue?

1           A       I don't recall.

2           Q       Describe the bulk or the amount of materials  
3 that you got on that occasion.

4           A       It was a very small amount. It was like that  
5 (indicating).

6           Q       And when did you next get materials from  
7 Controller Archives?

8           A       It would have been sometime later in the year,  
9 perhaps the October, November period.

10          Q       And describe the circumstances under which you  
11 got those materials.

12          A       Tom Vorm saw me and said that I could go through  
13 the trunks. He made some time. We went there together. We  
14 went through the trunks.

15          Q       Did this just happen spontaneously, or had you  
16 made some inquiries of Mr. Vorm?

17          A       Yes. Yeah, it was something we had been discuss-  
18 ing for a year previously.

19          Q       Do you know how Mr. Vorm went about obtaining  
20 authority for you to take any of these documents?

21          A       No.

22          Q       Do you know what the Controller Archives were,  
23 how they came about?

24          A       Only what I had been told.

25          Q       And who had told you anything about this?

26          A       Mary Sue and -- in dispatches and in discussions  
27 with Mike Smith and Tom Vorm.

28          Q       And you had heard Mary Sue's explanation on



1 Tuesday of how the Controller Archives originally came into  
2 being; is that right? Do you recall it?

3 A Maybe you could state it again.

4 Q She testified that they were originally made up  
5 of trunks of material that were brought from England onto the  
6 APOLLO, various materials of hers and Mr. Hubbard's. Do you  
7 remember that now?

8 A Yes.

9 Q Was that your understanding of what those  
10 materials were and the period that they were from?

11 A Yes.

12 Q Was it also your understanding that the Controller  
13 Archives were under the authority of Mary Sue?

14 A Yes.

15 Q How many materials did you remove from the  
16 Controller Archives?

17 A I'd say about three standard boxful.

18 Q Would you give me a definition of a standard box,  
19 what --

20 A About two feet long.

21 Q About one foot wide?

22 A I'd say it was probably a total of maybe four  
23 linear feet of materials.

24 MR. STECHEL: That's per box?

25 THE WITNESS: No. Total.

26 MR. STECHEL: Okay. Excuse me.

27 BY MR. LITT:

28 Q From what other Church property did you gather up

1 materials?

2 A From what's called Pers Sec files.

3 Q And where were those files kept?

4 A Pers Sec files were kept in my area in the Pers  
5 PRO Bureau in Los Angeles.

6 Q And that was under the authority of Laurel?

7 A Yes.

8 Q And how much material did you obtain from there?

9 A 20 boxes; 20, 30 boxes.

10 Q What was the nature of that material?

11 A Those were Mr. Hubbard's personal files which  
12 Pers Sec maintained.

13 Q Can you give me an idea of the nature of the  
14 files, what kind of topics they dealt with.

15 A They dealt with Mr. Hubbard's family, correspond-  
16 ence with his family, pre-Dianetics and Scientology materials,  
17 writings, communications to and from the Guardians Office.

18 There were awards; there was correspondence with Explorers  
19 Club, with groups of which he was a member, that sort of thing.

20 Q Did these materials relate to any particular time  
21 period?

22 A All time periods from prior to his birth onwards.

23 Q And what were the materials that you got from  
24 the Controller Archives? Can you describe the nature of those  
25 materials?

26 A They were some of Mr. Hubbard's writings, some  
27 materials to do with places where he'd lived, to do with  
28 correspondence with various companies, with photographic places,

1 with just about it, anything that -- I don't know.

2 Q Were there letters between Mr. Hubbard and family  
3 members and friends in the Controller Archives materials?

4 A Yes.

5 Q Describe those for me.

6 A Letters between Mr. Hubbard and Mary Sue, between  
7 Mr. Hubbard and his father, his mother, between Mr. Hubbard  
8 and friends. That's it.

9 Q How large a portion of this four linear feet were  
10 these letters?

11 A Very small. Probably three or four inches.

12 Q And describe for me the personal letters between  
13 Mr. Hubbard and family or friends that were in what you  
14 described as the Pers Sec materials or files.

15 A There was letters between him and his children,  
16 between him and his agent, between him and friends, associates,  
17 between him and organizations.

18 Q The letters between Mr. and Mrs. Hubbard --  
19 Mary Sue I'm referring to -- that are presently under seal,  
20 where did they come from?

21 A Which ones?

22 Q Well, all of them. If different ones came from  
23 different places, describe them as best you can for me.

24 A Okay. Some of them from R Storage and some of  
25 them from Controller Archives, some of them are Pers Sec files.

26 Q Are there any datings that determine which came  
27 from what?

28 A There's no -- there's no hard rule on that.

1 Q In general.

2 A In general Controller Archives was late '50s and  
3 '60s, R Storage was up to late '50s, and the Pers Sec files  
4 spanned the whole thing.

5 Q Any other materials that you gathered from  
6 Scientology facilities?

7 A Oh, I see. Just generally?

8 Q Yes.

9 A There was some material which was sent to me from  
10 the Guardians Office at WW and the US.

11 Q How much material was that?

12 A Probably a linear foot.

13 Q Any other Scientology facilities from which you  
14 gathered materials?

15 A From the office of the Personal Public Relations  
16 Officer.

17 Q Who was that?

18 A That was Laurel.

19 Q Personal Public Relations Officer, does that  
20 refer to public relations officer for Mr. Hubbard?

21 A Yes.

22 Q Were these separate files from the Pers Sec files?

23 A Yes.

24 Q And where were they maintained?

25 A They were maintained at Gilman Hot Springs and  
26 later in Los Angeles and also in Clearwater.

27 Q And how much material did you gather up from  
28 there?

1           A       Probably 10 linear feet.

2           Q       What was the nature of that material?

3           A       It was a lot of biographical material which that  
4 organization had created in the past, things that they had  
5 written about Mr. Hubbard; there were orders from Mr. Hubbard  
6 regarding public relations, his PR, orders to his public  
7 relations personnel; there was information on the biography  
8 itself, what predated it, the biography project; there was  
9 photographic material; and there were material which was used  
10 by the public relations bureau to put together public relations  
11 presentations on Mr. Hubbard.

12           Q       All right. Then going back to the Guardians  
13 Office materials, what was the nature of those materials that  
14 you gathered up?

15           A       Those were to do with Quentin; they were to do  
16 with Mr. Hubbard's Naval history; they were to do with  
17 Guardians Office information on people viewed as enemies of the  
18 organization; they were to do with information that the  
19 Guardians Office had on -- had collected on Sara, Hubbard's  
20 second wife, and on his first wife and on his children.

21           Q       Any other Scientology facilities from which you  
22 gathered information?

23           A       I don't believe so.

24           Q       Now, in addition to gathering information from  
25 Scientology facilities, as I understand it, you also gathered  
26 documents, other things from private individuals; is that  
27 correct?

28           A       Yes.

1 Q And you purchased documents or photographs or  
2 memorabilia from various private individuals?

3 A Yes.

4 Q How were these materials paid for?

5 A Cash.

6 Q Where did you get the cash?

7 A Either from Sea Org Reserves or from the CMO.

8 Q And were you gathering up such private materials  
9 throughout this whole period of time of 1980 and 1981?

10 A No.

11 Q When did you begin that?

12 A When I -- whenever I encountered some materials  
13 in the course of my work.

14 Q When did that start?

15 A Mid-1980.

16 Q And did you take some trips in order to go about  
17 purchasing these materials?

18 A I purchased materials on those trips.

19 Q Were you performing other functions as well on  
20 those trips?

21 A Yes.

22 Q What other functions?

23 A Research, biographical research.

24 Q What type of research?

25 A Interviews, going through public records,  
26 geneology study.

27 Q Now, during these years 1980 and 1981, did you  
28 receive any salary of any type while you were carrying out

1 these activities?

2 A I was paid an allowance.

3 Q Standard allowance for a Sea Org member?

4 A Yes.

5 Q You were a Sea Org member; right?

6 A Yes.

7 Q And you were provided room and board?

8 A Yeah.

9 Q And you were provided Scientology services?

10 A Yeah.

11 Q In other words, the normal arrangement for some-  
12 body who was a staff member for a Scientology organization?

13 A Yes.

14 Q At some point was there an agreement reached with  
15 Omar Garrison whereby he was to write an authorized biography?

16 A Yes.

17 Q And how did you find out about that?

18 A I was informed of it.

19 Q Do you know who informed you?

20 A Laurel.

21 Q Do you know about when that was?

22 A I believe it was in October 1980.

23 Q And what were you told about the arrangement  
24 with Mr. Garrison?

25 A That a contract had been signed by him.

26 Q And what was your understanding as to the nature  
27 and terms of that contract?

28 A That he was going to write a biography.

1 Q Did you understand that it was an authorized  
2 biography?

3 A Yes.

4 Q And it was your understanding that the Church  
5 would assist him in these efforts?

6 A Yes.

7 Q And that at some point a manuscript would be  
8 prepared and submitted for review?

9 A Yes.

10 Q Reviewed by the Church?

11 A No.

12 Q Reviewed by whom?

13 A By Mr. Hubbard.

14 Q To see whether he approved of it?

15 A Yes.

16 Q How about Mrs. Hubbard? What was her relationship  
17 to this as far as you knew?

18 A The manuscript -- my understanding was the manu-  
19 script was to go to her initially and then to Mr. Hubbard.

20 Q So it's fair to say that basically it was  
21 subject to the review and approval of the two of them as far  
22 as you understood it?

23 A Yes.

24 Q Going back to the R Storage for a moment, was it  
25 your understanding that it contained the private materials of  
26 Mr. and Mrs. Hubbard?

27 A At the time I only thought of Mr. Hubbard as  
28 having anything to do with those materials.



1 Q Having subsequently gotten into it, did you  
2 find things that were Mrs. Hubbard's among those materials?

3 (Off the record.)

4 THE WITNESS: Yes.

5 BY MR. LITT:

6 Q Did you find anything else of Mrs. Hubbard's in  
7 LRH Pers Sec files files?

8 A Yes.

9 Q In your experience in Scientology, would  
10 Mrs. Hubbard have had the authority to take anything out from  
11 those materials if she had wished them? I'm referring now to  
12 the R Storage, the Controller Archives, and the LRH Pers Sec  
13 materials.

14 A Yes.

15 Q And Mr. Hubbard would have?

16 A Yes.

17 Q Would anybody not acting on behalf of one of them  
18 have had such authority?

19 A No.

20 Q Now, after Mr. Garrison became assigned to write  
21 this biography, did you then work with him?

22 A Yes.

23 Q And what form did that take?

24 A I copied information from the -- from the archives  
25 which I assembled, and I delivered that -- those materials to  
26 Mr. Garrison.

27 Q And how did you determine what to copy?

28 A At times I would ask; at times I understood what

1 was important biographically, what he needed. It depended on  
2 the situation.

3 Q And did you have to go through any procedure  
4 clearing providing material to him, or did you use your dis-  
5 cretion?

6 A It was my discretion.

7 Q Did you get approval from anyone to make copies  
8 and deliver them to him?

9 A I was on project orders to that. I was ordered  
10 to.

11 Q Who ordered you to?

12 A Laurel.

13 Q Well, tell me about that. What did Laurel order  
14 you to do?

15 A I was on project orders, and it was understood  
16 that I was to do that per the contract with Omar Garrison.

17 Q What form did Laurel's orders take?

18 A First of all there was a project existing, and  
19 second of all she was my direct senior so I saw her on a daily,  
20 12-, 14-hour basis.

21 Q Well, let's take written for starters.

22 A Okay.

23 Q What in writing ordered you to do that?

24 A The contract.

25 Q Did you see the contract?

26 A Yes.

27 Q Did the contract make specific reference to  
28 giving Mr. Garrison his own copies of various materials that

1 he requested?

2 A No. That was -- I was to be the researcher.  
3 Prior to that Mr. Hubbard's attorney had indicated that -- that  
4 this was a significant selling point in getting Omar Garrison  
5 to do the biography.

6 Q What was the significant selling point? Providing  
7 him access --

8 A The fact that Mr. Hubbard was making available  
9 to him all of his private materials.

10 Q My question is a little more narrow than that.  
11 My question is delivering to Mr. Harrison his own set of copies  
12 of various materials. I'm not asking you now of providing  
13 access to materials. Were there any orders that you received  
14 requiring you to give Mr. Garrison his own copies of these  
15 materials?

16 A Yes.

17 Q What orders?

18 A There was a project which was written by Laurel,  
19 and I contributed to it, and it had to do with the biography  
20 arrangements -- arrangements for the biography, and it was a  
21 mimeo'd order. Therefore it was approved by the -- approved  
22 by CMO, and it made arrangements for delivery of documentation  
23 to Omar Garrison both -- either at where we were or at his  
24 home in Cedar City.

25 Q And what was your understanding of Mr. Garrison's  
26 rights to use this documentation? Was it for the biography?

27 A Yes.

28 Q Was he free to do with these documents as he

1 wished, or were they for the specific purposes you understood,  
2 of using it for the biography?

3 A For use in the biography.

4 Q Were there any verbal orders from Laurel to you  
5 about having you deliver him various materials?

6 A I'm sure there were.

7 Q Do you recall any specific ones?

8 A "Get these documents copied"; "get these ones to  
9 Omar" many, many times. Many times it was discussed.

10 Q When was it that the idea formulated in your  
11 mind to leave Scientology?

12 A December 1981.

13 Q At that time you had various materials in these  
14 archives that you collected; right?

15 A Yes.

16 Q And Mr. Garrison had various materials?

17 A Yes.

18 Q As best you can, describe for me what materials  
19 Mr. Garrison had at that time.

20 A Mr. Garrison had a number of binders which I had  
21 made of copies of materials. It was about 400 and -- 400 or  
22 so binders. They covered correspondence between Mr. Hubbard  
23 and wives, Mr. Hubbard and his family; they covered poetry  
24 written by Mr. Hubbard; they covered many things which had  
25 been written by Mr. Hubbard; they contained some of his  
26 writings and unpublished manuscript EXCALIBUR; public relations  
27 pieces about Mr. Hubbard; geneology information about  
28 Mr. Hubbard; information which predated him; information about

1 his father; information about his mother; files and information  
2 on each of his wives. That was mainly in binders. There was  
3 a lot of loose information which had never been copied; there  
4 were boxes of various kinds; there were tape recordings,  
5 cassettes of interviews which had been done, interview tran-  
6 scripts; there was copies of stories which Mr. Hubbard had  
7 authored principally.

8 Q Of the materials that you had gathered in these  
9 archives that you have described, approximately what percentage  
10 had been provided to Mr. Garrison?

11 MR. STECHEL: I'm sorry. Could I have that last  
12 question read.

13 (The record was read by the reporter.)

14 THE WITNESS: Let us clarify some things. When we talk  
15 about materials here, we're just going to talk about papers; is  
16 that correct?

17 BY MR. LITT:

18 Q That's fine.

19 A Okay. I'd say a third.

20 Q At the time that the idea formulated in your mind  
21 that you would leave Scientology, were there any other copies  
22 of these materials that had been placed or delivered anywhere  
23 else other than into the archives that you had put together and  
24 what had been provided Mr. Garrison?

25 A No.

26 Q Did you make, prior to leaving, copies of some of  
27 these materials to take with you?

28 A By that what do you mean?

1 Q You don't understand what I mean?

2 A When I finally left, I delivered when I left the  
3 -- some materials to Mr. Garrison, but that was -- I never took  
4 anything myself personally.

5 (Off the record.)

6 BY MR. LITT:

7 Q Well, let me ask you the question this way: at  
8 the point that you decided to leave Scientology, did you make  
9 copies of volumes of material for some purpose subsequent to  
10 your decision?

11 A Other than to try to complete my obligation to  
12 Omar Garrison, no.

13 Q What did you do at that time to complete your  
14 obligation to Omar Garrison?

15 A I attempted to get to him biographical informa-  
16 tion which I thought he would need to write the book.

17 Q And as I understand it, you wanted to make sure  
18 that he got information that would reveal what you considered  
19 to be the real truth about Mr. Hubbard; is that right?

20 A I would say that he would have as much biographi-  
21 cal information as I could provide for him to do an honest  
22 biography.

23 Q When you left Scientology, did you take any  
24 materials with you?

25 A No.

26 Q The materials that are presently under seal in  
27 the court, where did they come from?

28 A Omar Garrison.

1 Q When did you get that from Mr. Garrison?

2 A I think for the most part in May or June.

3 Q Did you travel to his home?

4 A Yes.

5 Q And for what purpose did you travel to his home?

6 A He asked me to assist with the biography project.

7 Q How did it come about that he asked you to assist  
8 with the biography project?

9 A He simply asked me.

10 Q Well, had you spoken with him between December or  
11 May and June?

12 A Yes, many times.

13 Q And you went there to assist him?

14 A I'm not following that last question.

15 Q Well, did you go out there in May or June to  
16 assist him?

17 A I went over to his place to -- I went over many  
18 times to assist him.

19 Q I'm speaking of now after you left Scientology.

20 A Yes.

21 Q After you left you went many times to assist him?

22 A Yes.

23 Q And it was still, of course, your understanding  
24 that the biography was subject to approval?

25 A Yes.

26 Q And was it on your May or June visit that you  
27 gathered up these materials that are now in the custody of the  
28 court?

1 A For the most part, yes.

2 Q And why is it that you took copies of those  
3 materials?

4 A Because I was going through the materials to sort  
5 out what was usable biographically and what wasn't and to  
6 copy them.

7 Q Copy them for what purpose?

8 A For Mr. Garrison.

9 Q I thought he had copies?

10 A He did have copies.

11 Q So why were you copying them for Mr. Garrison?

12 A Mr. Garrison felt that there was a possibility  
13 that the organization would steal copies of materials which he  
14 had, and he wanted to make sure that there was a duplicate set.

15 Q So he asked you to make a duplicate set?

16 A Yes.

17 Q And secrete it for him?

18 A I never got into the secreting of it, but he did  
19 ask me to make a duplicate set.

20 Q What were you to do with the duplicate set?

21 A I kept -- kept it in an office in -- that I had  
22 for him.

23 Q Where?

24 A In Costa Mesa.

25 Q And at some point did you take these materials  
26 that Mr. Garrison had had you copy and send them to Michael  
27 Flynn?

28 A Yes.



1 Q When was that?

2 A It was probably in -- it was probably in July.

3 Q And at the time you were familiar with the fact  
4 that Michael Flynn represented a large number of persons suing  
5 the Church of Scientology and Mr. and Mrs. Hubbard?

6 A Yes.

7 Q And did you give Mr. Flynn permission to use these  
8 documents in those cases?

9 A No.

10 Q Did he use them in those cases?

11 A Not to my knowledge.

12 ? Q Did you use them in those cases?

13 A Yes.

14 Q Did you believe when you used them in those cases  
15 that that was pursuant to the conditions under which  
16 Mr. Hubbard and Mrs. Hubbard or the Church of Scientology had  
17 allowed you to gather them up?

18 A No.

19 Q Did you place any limitations when you provided  
20 these documents to Mr. Flynn on his use of them?

21 MS. DRAGOJEVIC: I'm going to have to object to this.  
22 I think it's beginning to invade the attorney-client privilege  
23 here.

24 MR. LITT: If they are used for other litigation, there  
25 is no attorney-client privilege, flat out, plain and simple.

26 MS. DRAGOJEVIC: You may be getting into areas of  
27 discussion between Mr. Armstrong and --

28 MR. LITT: I'm not asking for his discussions concerning

1 his retention of Mr. Flynn to represent him. I'm asking for  
2 limitations with respect to Mr. Flynn's use of those materials  
3 in other matters other than Mr. Flynn's retention by Mr.  
4 Armstrong, and that is not privileged matter.

5 THE WITNESS: So may I ask you a question?

6 BY MR. LITT:

7 Q Did you place limitations with Mr. Flynn on his  
8 ability to use these documents?

9 A Yes.

10 Q I am not asking you now about what you asked him  
11 to do about representing you. But other than his use in  
12 representing you, what limitations did you place upon his use  
13 of these documents?

14 A I wanted to ensure that the biographical materials  
15 were not given out so that the biography could go forward.

16 Q What did you mean "were not given out"?

17 A I didn't -- I felt that I had an obligation to  
18 Omar Garrison, and I did not want the biographical materials  
19 distributed.

20 Q What about use in litigation? Did you place any  
21 limitations upon Mr. Flynn's ability to draw on those materials  
22 in cases of litigation in which he did not represent you?

23 A It's my recollection we did not discuss the  
24 matter. That -- what I just gave you was my understanding.

25 Q Do you have any knowledge of whether or not  
26 Mr. Flynn used these materials for purposes of any litigation  
27 in which he did not represent you?

28 A Only in the documentation that I provided on a

1 particular affidavit, declaration.

2 Q Did you read the letters that were among these  
3 materials that were letters between Mr. and Mrs. Hubbard?

4 A A great deal of them, yes.

5 Q Did you consider them personal?

6 A Yes.

7 Q Did you consider them private?

8 MS. DRAGOJEVIC: Private in what sense? Are you asking  
9 him for a legal conclusion?

10 MR. LITT: No. I'm using the term as it is used in the  
11 normal English language, not a legal meaning.

12 THE WITNESS: I would say yes with the qualification  
13 that they were made available to me for use in the biography.

14 BY MR. LITT:

15 Q Did you think that Mr. Hubbard or Mrs. Hubbard  
16 would have approved your making them available to Mr. Flynn?

17 A No.

18 Q Did you ever in the slightest consider that the  
19 access that you had been provided included authority from either  
20 of them to do that?

21 A No.

22 Q When did you retain Mr. Flynn?

23 A It was either May or June of 1982.

24 Q Did you attend the Clearwater City Commission  
25 hearings?

26 A No.

27 Q Were you in Florida around that time?

28 A Yes.

1 Q Did you see Mr. Flynn there?

2 A Yes.

3 Q What was the first time you had ever had contact  
4 with Mr. Flynn?

5 A I called him some days before that.

6 Q To discuss retaining him or to discuss some  
7 other subject matter?

8 A I guess it was retaining him. I was afraid for  
9 my life.

10 Q Did you go to the police?

11 A No.

12 Q Had you retained him on that telephone call?

13 A You'll have to explain to me "retained." I asked  
14 him for help. Does that mean retained?

15 Q Well, that's fine.

16 A Okay.

17 Q Did you take him a copy of a letter between  
18 Mr. and Mrs. Hubbard, specifically a letter from Mrs. Hubbard  
19 to give to him?

20 A No.

21 Q Did you take any materials at that time to give  
22 to him?

23 A No.

24 Q I'm speaking now of when you saw him in Clearwater.

25 A (No audible response.)

26 Q Your answer is the same; is that right?

27 A I did not take any materials to give to him.

28 Q Didn't you testify just a minute --

1 (Off the record.)

2 BY MR. LITT:

3 Q Mr. Armstrong, let's go back to the material you  
4 took to Mr. Flynn in May.

5 A Yes.

6 Q How did you get to Clearwater?

7 A How did I get there?

8 Q Yes.

9 Mr. Flynn paid for that flight; right?

10 A Yes, he did.

11 Q And at that time you had an original of a letter  
12 from Mrs. Hubbard to Mr. Hubbard?

13 A Yes.

14 Q When was that letter written?

15 A Excuse me? I think sometime in the mid-'50s.

16 Q And at that time how much of the materials that  
17 you had originally gathered did you have in your possession or  
18 copies thereof?

19 A Very few.

20 Q Can you tell me what they were.

21 A I had the letter and I had some correspondence  
22 which indicated who had been writing letters to Nibs, L. Ron  
23 Hubbard, Jr., in his father's name, signing for his father.

24 Q And how did you come into possession of those  
25 letters or documents?

26 A Those were part of correspondence regarding Nibs  
27 which I had obtained from Omar Garrison.

28 Q When did you get these?

1           A       Just prior to leaving.

2           Q       Why did you have these particular documents?  
3 What was it that led to your getting these particular documents  
4 from Mr. Garrison?

5           A       I had the letter because I had it for a couple of  
6 months. I was attempting to get it to Mrs. Hubbard; and the  
7 other thing with L. Ron Hubbard, Jr. I had because I wanted  
8 to meet him at that time because I felt that he had been  
9 victimized by the organization and that he had been cheated by  
10 his father and by others in the organization, and I felt a  
11 great deal of sympathy for him and his situation.

12          Q       Why had you been trying to get the letter to  
13 Mrs. Hubbard?

14          A       Because I did not like the way that the organiza-  
15 tion had denounced her as a criminal when the Guardians Office  
16 was broken up, and I felt that I had come across this letter  
17 in late 1981. I had attempted a number of times to get some  
18 communication to her. I tried to arrange an interview with  
19 Omar Garrison, and I was told by the people in control of  
20 Scientology that there was no line to Mary Sue Hubbard any more,  
21 and I had wanted to send that letter. I --

22          Q       Was there something about that particular letter  
23 that made you want to send it?

24          A       Yeah. I -- she had mentioned in it an attempted  
25 suicide and the rift between her and her husband and the fact  
26 that he was choosing organization people over her, and I saw  
27 the same pattern happening again and again. I -- I attempted  
28 to send the letter to her.

1 Q Because you felt it was particularly personal  
2 and private?

3 A Yeah.

4 Q Did you retain Mr. Flynn to advise you?

5 A Yes.

6 Q About this letter?

7 A Yes.

8 Q To advise you as to your rights in the letter?

9 A I don't know what you mean by that question.

10 Q Did you retain Mr. Flynn to give you advice con-  
11 cerning your rights and interest in the use of this letter?

12 A I told him that I had been trying to get --

13 MS. DRAGOJEVIC: Just a minute.

14 BY MR. LITT:

15 Q I'm not asking you for what you told him.

16 MS. DRAGOJEVIC: Jerry, please be careful. Say yes or  
17 no.

18 THE WITNESS: I don't know how to answer. It's such a  
19 colossal -- rights and interests.

20 BY MR. LITT:

21 Q The point is you retained Mr. Flynn to advise you  
22 concerning whatever rights and interest you had with respect to  
23 any dispute or possible dispute with Scientology not concerning  
24 your rights and interest in the letter; is that correct?

25 MS. DRAGOJEVIC: If you understand that question. I  
26 think it calls for a legal conclusion. I don't think he can  
27 understand what you mean by that.

28 THE WITNESS: I really don't know how broad that goes.

1 BY MR. LITT:

2 Q Well, let me ask you: you did not feel that the  
3 letter belonged to you, did you?

4 A No.

5 Q You felt it belonged to Mary Sue?

6 A Yes.

7 Q That's why you were trying to return it to her?

8 A Yes.

9 Q Especially given its personal nature?

10 A Yes.

11 Q You gave a copy of the letter to Mr. Flynn in  
12 Clearwater; is that right?

13 A No.

14 Q Did you show the letter to him?

15 A Yes.

16 Q Did he make a copy of it?

17 A No.

18 Q Did you make a copy of it at some point?

19 A I believe earlier I had.

20 Q When you were sending the original of this letter  
21 to Mary Sue, were you retaining a copy?

22 A No, I didn't have one.

23 Q When did you make a copy?

24 A Sometime later in the year.

25 Q Where's the original letter now?

26 MS. DRAGOJEVIC: I think I should interject here.

27 Mr. Armstrong has recently turned over an envelope to us which  
28 apparently contains the original of the letter which he



1 attempted to mail back in August 1982 to Mrs. Hubbard, and it  
2 indicates on the outside of the envelope "Remailed. Not in  
3 registry. Return to sender. Addressee unknown," and there are  
4 several stamps on the back, August 16, 1982. This envelope is  
5 unopened, but I understand that it contains the original.

6 Now, it's our intention to take it down to the  
7 court so that there is no question of contempt or dissemination  
8 or publication of this document that's contained in this  
9 envelope that has not been opened and to allow the court to  
10 make a decision as to whether it will go into the sealed docu-  
11 ments. If you would like to open it in the presence of the  
12 court reporter, we can do so, and we can indicate what is inside  
13 the envelope. We have not opened it solely for that purpose.  
14 We wanted to do it in the presence of the court or in front of  
15 the court reporter and counsel.

16 BY MR. LITT:

17 Q Is it your representation, Mr. Armstrong, that  
18 this is the original of that letter?

19 A I put the original of that letter in that  
20 envelope and mailed it back in August.

21 MR. LITT: I think it's probably best to leave it in  
22 its present form until it's taken to the court.

23 MS. DRAGOJEVIC: We are planning to do that immediately  
24 next week.

25 THE WITNESS: There is also a letter to Mrs. Hubbard  
26 in there.

27 MS. DRAGOJEVIC: If you would like to examine the  
28 envelope, you may do so.

1 MR. LITT: Okay.

2 MS. DRAGOJEVIC: Do you want me to make a copy?

3 MR. LITT: Please make a copy of the back and the  
4 front.

5 MS. DRAGOJEVIC: You can attach it to the deposition.  
6 That might be a good idea. Let's take a short break.

7 (Brief recess.)

8 MS. DRAGOJEVIC: I have made a copy of the front and  
9 back side of the envelope which I have given to the reporter,  
10 and the reporter indicates that she's simply marking a copy  
11 and not the original.

12 (A photostatic copy of the above docu-  
13 ment was marked Intervenor's Exhibit 1  
14 for identification by the reporter and  
15 is attached hereto.)

16 BY MR. LITT:

17 Q The letter that's contained in the envelope that  
18 has been copied as Exhibit 1, is that the letter that you  
19 showed to Mr. Flynn in May?

20 A The letter which I believe that I put in that  
21 envelope is the same letter.

22 Q Is there a copy of that letter presently among  
23 the documents under seal in the Superior Court?

24 A I'm not sure.

25 MS. DRAGOJEVIC: I'd like to indicate for the record  
26 that this letter was mailed prior to the entry of the  
27 preliminary injunction order by Judge Cole. So that the record  
28 is clear on the dating, the injunction, I believe, was signed

1 October 4, 1982, and this letter was apparently mailed August  
2 16, 1982, and took quite some time in returning.

3 BY MR. LITT:

4 Q I'm still a little unclear. Did you make a  
5 copy of that letter at some point?

6 A Yes.

7 Q Was the copy that you made also contained in that  
8 envelope?

9 A No.

10 Q What did you do with the copy?

11 A I'm pretty sure that I brought it here to this  
12 office.

13 Q With respect to the materials that you originally  
14 gathered from R Storage, Controller Archives, LRH Pers Sec --  
15 taking these three, did you ever receive any specific authori-  
16 zation from Mr. or Mrs. Hubbard to obtain those materials?

17 A Yes.

18 Q Tell me what.

19 A From Alan Wertheimer who was Mr. Hubbard's  
20 attorney.

21 Q What form did this authorization from  
22 Mr. Wertheimer take?

23 A He indicated to me that it was -- that the fact  
24 that Mr. Hubbard had made available his archives was a very  
25 important selling point with regards to getting Mr. Garrison  
26 to do the biography, and he instructed me when I was sent to  
27 England to meet Mr. Garrison initially to tell Mr. Garrison  
28 that fact and, in fact, to give Mr. Garrison an inventory of

1 the materials which we at that time had in what was known as  
2 the LRH Archives.

3 Q Who retained Mr. Wertheimer?

4 A I was told that initially Doreen Gillham and Mike  
5 Smith retained Mr. Wertheimer.

6 Q To your knowledge, did Mr. Wertheimer ever meet  
7 Mr. Hubbard?

8 A No.

9 Q Do you know of any document in which Mr. Hubbard  
10 specified that items that had been in his personal storage were  
11 available for use in this biography?

12 A I believe so, yes.

13 Q What is that?

14 A I wrote a -- his response, his answer to my  
15 petition, I believe, contained something to that effect, but  
16 also I wrote to him a -- what's called a Non-Existence Formula,  
17 Non-Existence Request which he answered and in which he  
18 indicated that he had thought that his materials were all  
19 stolen in 1953 and that it was good that I was finding them.

20 Q What materials was he referring to; do you know?

21 A He indicated that all of his records up to 1953  
22 were lost or stolen and that I had apparently found these  
23 things.

24 Q The personal storage materials, was there any  
25 specific reference to the materials kept at Gilman Hot Springs  
26 designated as R Storage in his reference to what materials you  
27 could draw on?

28 A You'll have to restate that question.

1 further advised that Mr. Hubbard is willing to make his personal  
2 files and records available to PDC and Mr. Garrison."

3 That was the understanding under which I undertook  
4 to do the biography project and my work with Mr. Garrison.

5 Q It was also your understanding with respect to  
6 that --

7 MS. DRAGOJEVIC: Just so the record is clear. This is  
8 a letter dated November 17, 1980 which Mr. Armstrong has just  
9 read from. It's to Mr. Larry Brennan of the Scientology publica-  
10 tions organization in Copenhagen, and it's regarding L. Ron  
11 Hubbard, an authorized biography. The letter has the name  
12 Mr. Wertheimer at the end; however, there is no signature.

13 BY MR. LITT:

14 Q And it was your understanding that these personal  
15 files were subject to the conditions that we have already  
16 discussed, that is, the final approval of Mr. and Mrs. Hubbard?

17 MS. DRAGOJEVIC: I'm sorry. Could you repeat that.  
18 I didn't understand it.

19 BY MR. LITT:

20 Q Well, you have indicated that you consider this  
21 letter from Mr. Wertheimer to be an authorization for gaining  
22 access to these files. So I'm just reclarifying that the  
23 purpose of this, as you understood it, was for the preparation  
24 of a biography which was ultimately subject to the approval of  
25 both Mr. and Mrs. Hubbard?

26 A That was my understanding.

27 Q No other purpose?

28 A No.

1 Q You didn't understand any general right to gain  
2 access to those files for other purposes other than this one  
3 purpose?

4 A Other than the accumulation of the files them-  
5 selves, accumulation of archival material itself.

6 Q Which was subject to the control of Mr. and Mrs.  
7 Hubbard, the archival material?

8 A I would think it would be, yes.

9 Q That was your understanding?

10 A Yes.

11 Q All right. Anything else that you consider to be  
12 specific authorization from Mr. Hubbard to gain access to these  
13 materials?

14 A There was a letter of authorization from Pat Brice  
15 who was the personal secretary to Mr. Hubbard.

16 Q Is that the letter that was marked during  
17 Mrs. Hubbard's deposition?

18 A Yes.

19 Q It was addressed: To Whom It May Concern?

20 A Yes.

21 Q That was addressed not to the Scientology  
22 organizations but to third parties?

23 A Yes.

24 Q Outside of Scientology?

25 A Either inside or outside.

26 Q Well, let me put it like this: it wasn't  
27 addressed to Scientology organizations; right? It was  
28 addressed to --

1 A Yes.

2 Q -- other parties --

3 A Yes.

4 Q -- correct? So you didn't consider that to be  
5 authorization to obtain materials from Scientology organizations  
6 right? You considered your authority for that to come from  
7 somewhere else?

8 A Yes.

9 Q Anything else that you considered to be authori-  
10 zation, specific authorization from Mr. Hubbard?

11 A I think the letter which he wrote in 1977 having  
12 to do with Omar Garrison as an author. I consider the fact  
13 that his personal representative, based on orders and communica-  
14 tions from him, had me carry out the work; the fact that his  
15 personal representatives authorized the money which was spent  
16 on the project; the fact that Mary Sue Hubbard authorized the  
17 money which was spent on the project.

18 Q Well, that money was for paying to gather  
19 materials from third parties; right? That wasn't money for  
20 getting into his personal storage or into Controller Archives?

21 A No. That was not true.

22 Q What money was spent for that?

23 A The money which was spent -- it was all part of  
24 approval which went on a monthly basis to the CMO and/or to  
25 Mary Sue Hubbard which included the fact that I was copying  
26 materials and giving this material to Omar Garrison.

27 Q Did those make specific references, those  
28 authorizations, to what you were copying?

1 A Yes.

2 Q Do you have copies of those?

3 A No, I don't. The organization has all those  
4 copies.

5 Q Anything else that you consider to be specific  
6 authorization?

7 A I can't recall anything at this time.

8 Q With respect to Mrs. Hubbard, is there anything  
9 additional that you consider to be specific authorization from  
10 her?

11 A Yes.

12 Q What's that?

13 A The fact that I corresponded with her; I sent her  
14 briefings a number of times throughout 1980 and '81 on what I  
15 was doing; that I reported, gave her progress reports on the  
16 biography project; the fact that Omar Garrison corresponded  
17 with Mrs. Hubbard regarding the research which I was doing; the  
18 fact that Mrs. Hubbard oversaw, in fact, issued orders into the  
19 biography project even down to as much as what percentage  
20 ought to be offered to Mr. Garrison; the fact that Mrs. Hubbard  
21 would have received copies of these as correspondence between  
22 Mr. Wertheimer, who was Mr. Hubbard's attorney, and Larry  
23 Brennan.

24 Q Anything else?

25 A The fact that Mary Sue Hubbard wrote in her answer  
26 back to me that I should liase with the GO archives people for  
27 non-technical material.

28 Q Anything else?



1           A       The fact that she was in very close communication  
2 on a daily basis with Laurel Sullivan throughout 1980 and much  
3 of 1981, both written and by telephone; and that Laurel kept  
4 me informed of what Mary Sue's answers were or comments and that  
5 sort of thing; the fact that Laurel was in charge of the  
6 biography project and that she knew everything that I was giving  
7 to Omar Garrison; she saw all the binders which I created; she  
8 knew where the information came from; she reported to me that  
9 Mary Sue was very pleased about the materials that I had found  
10 because she had understood that in 1953 Sara, who was Hubbard's  
11 second wife, had stolen these materials, and she was pleased  
12 that I had found them. Mary Sue authorized the purchase of a  
13 photocopier, to which, the proposal for which I attached  
14 information on what I was doing; the fact that I was providing  
15 documentation and what it was to Omar Garrison and what I had  
16 in my possession.

17                   When I returned from the first trip which I took  
18 in which I interviewed Mr. Hubbard's aunt and four cousins,  
19 I reported back to her on what I had done and the information  
20 which I had gathered and so on. It was obvious that she knew  
21 the biography project was going on and obvious she knew that  
22 the information was being provided to Mr. Garrison and where it  
23 was coming from.

24           Q       Anything else?

25           A       That's all I can think of for now.

26           Q       Do you contend that these documents belong to you?

27           A       I think that until the biography project is  
28 completed, yeah.

1 Q The biography project subject to the final  
2 approval of Mr. and Mrs. Hubbard?

3 A If that's possible.

4 Q Your authorization to act on the biography pro-  
5 ject, as far as authorization from Mr. and Mrs. Hubbard, was  
6 in a context in which your views were quite different than they  
7 are today; is that right?

8 A I think that my perception of the Hubbards and  
9 the organization of Scientology are quite different.

10 Q Do you contend that Mr. or Mrs. Hubbard would  
11 give you the authority to gain access to these documents with  
12 the present views that you have?

13 MS. DRAGOJEVIC: I will object to that as calling for  
14 speculation. He can't possibly determine --

15 MR. LITT: He certainly can.

16 Q Could you answer that question?

17 MS. DRAGOJEVIC: I'm going to instruct him not to  
18 answer. I think it calls for speculation.

19 MR. LITT: I'm asking whether he thinks he can answer  
20 the question -- unless you are going to instruct him that he  
21 can't answer that either, or is that speculation?

22 MS. DRAGOJEVIC: Certainly --

23 MR. LITT: It's speculation to state whether he could  
24 answer it or not? For a question to be speculative -- first  
25 of all, to instruct someone not to answer on the grounds of  
26 speculation is improper because the objection has to be  
27 ultimately sustained by the court. You can make your objection.  
28 To instruct him not to answer on those grounds is obstructive

1 of this deposition. If he can answer, he should answer.

2 My question to him: at this point do you think  
3 you can answer that question?

4 MS. DRAGOJEVIC: I think you are asking him to look  
5 into someone else's mind.

6 MR. LITT: I'm not asking him to look into someone  
7 else's mind.

8 Q Based on your experience with the Hubbards and  
9 in Scientology, is it your opinion based on your 12 years of  
10 experience that with your present views either of them would  
11 authorize you to act in the capacity of gathering up private  
12 documents of theirs?

13 MS. DRAGOJEVIC: Same objection. I think it calls for  
14 speculation. He's obviously not an expert of what Mr. and  
15 Mrs. Hubbard may have in their minds.

16 MR. LITT: Are you instructing him? If you instruct  
17 him, we will go to court on this; and if you lose, we will ask  
18 for sanctions. Let him state whether he thinks he can answer  
19 the question before you instruct him. It is improper to  
20 instruct on these bases.

21 MS. DRAGOJEVIC: Well, I don't think he can.

22 MR. LITT: Well, let him state whether he can.

23 Q Do you think you can answer that question?

24 A Give me the question, both of them, again.

25 Q Based on your years of experience in Scientology,  
26 is it your opinion that Mr. and Mrs. Hubbard or either of them  
27 would authorize you, given your current attitudes towards  
28 Scientology and towards them, to be allowed to act in the

1 capacity of gathering up their private documents? Do you think  
2 you can answer that?

3 A I don't know, but they might.

4 Q Have you ever observed in all of your years of  
5 Scientology a situation in which they ever granted such per-  
6 mission to someone who was hostile to them and to Scientology?

7 MS. DRAGOJEVIC: I don't think -- that tctally lacks  
8 foundation. I will object to that question. It assumes facts  
9 not in evidence; it lacks foundation; it is argumentative.

10 MR. LITT: It's not argumentative.

11 MS. DRAGOJEVIC: You haven't established any foundation  
12 with respect to that question.

13 MR. LITT: I don't have to establish a foundation. I'm  
14 asking him whether he ever observed something. He could say  
15 yes, or he could say no. There's no foundation to the ques-  
16 tion.

17 MS. DRAGOJEVIC: I want to hear the question over again,  
18 please, Miss Reporter.

19 (The record was read by the reporter.)

20 THE WITNESS: No.

21 BY MR. LITT:

22 Q Do you have any facts to point you to indicate  
23 that they would do so now?

24 A No.

25 Q Did you testify previously that you considered  
26 these documents to belong to Mr. Hubbard?

27 A At least some of them.

28 Q The bulk of them?

1 A Yes.

2 Q And some others that belong to Mrs. Hubbard?

3 A Yes.

4 Q And perhaps a few that belong to one or another  
5 Scientology organization?

6 A Uh-huh.

7 Q That's still your testimony?

8 A Yes.

9 Q And with respect to those documents that are  
10 either Mr. or Mrs. Hubbard's, would you agree that, based on  
11 your experience with the Hubbards and in Scientology, that  
12 Mrs. Hubbard would have the right to documents of Mr. Hubbard's?

13 MS. DRAGOJEVIC: I'm going to object to that as calling  
14 for speculation.

15 BY MR. LITT:

16 Q Can you answer that question?

17 A I don't believe she would.

18 Q Didn't you tell me earlier that it was only  
19 Mr. or Mrs. Hubbard, either of them or someone acting on their  
20 behalf that would have the right to control these documents?

21 A At least some of them, yes.

22 Q The personal documents of either of them?

23 A Yes.

24 Q I'm not now speaking of documents which would  
25 be the documents of the Church but one or the other of their  
26 documents?

27 A Yes.

28 Q Are you contending that that is no longer the case.

1 A It may no longer be the case.

2 Q Do you have any facts to indicate that it is no  
3 longer the case?

4 A I was told that in 1981 Mr. Hubbard ordered  
5 Mrs. Hubbard's removal from post, that he took away her power  
6 of attorney and stripped her of all power to act for him what-  
7 soever.

8 Q Who told you that?

9 A Laurel Sullivan.

10 Q Other than that information provided to you by  
11 Laurel Sullivan, do you have any other facts to point to?

12 A The fact that Mr. Hubbard always retained the  
13 rights to his materials and that he would never give them to  
14 anybody else.

15 Q But you already testified that in your experience  
16 these documents were subject to the control of Mr. or Mrs.  
17 Hubbard; right? Obviously --

18 A My understanding was what you were saying -- you  
19 were bringing this around to ownership of the documents rather  
20 than possessory right to them.

21 Q No, I'm not.

22 A Okay.

23 Q I'm speaking of right to control them. Do you  
24 agree that Mr. and Mrs. Hubbard jointly exercised the right  
25 to control the documents, in your experience?

26 A Yes, they did.

27 Q Do you contend that that is no longer the case?

28 A I don't know.

1 Q Do you have any facts to indicate that that would  
2 no longer be the case?

3 MS. DRAGOJEVIC: He just started listing some before.

4 MR. LITT: He can answer for himself.

5 THE WITNESS: The fact that I was authorized to do the  
6 biography by them and that I --

7 BY MR. LITT:

8 Q That's not what I'm speaking to. I'm not asking  
9 you at all about the issue of whether or not you were author-  
10 ized to gain access to these documents. I'm asking you about  
11 the final control of them; okay? Two separate things.

12 A The documents --

13 MS. DRAGOJEVIC: Presently or when?

14 THE WITNESS: You are referring to the documents which  
15 are somewhere? Some documents; is that correct?

16 BY MR. LITT:

17 Q I'm talking about any documents which are the  
18 personal documents, the documents owned by either Mr. or Mrs.  
19 Hubbard as opposed to documents owned by any Scientology  
20 organization. That's the framework that I'm dealing in.

21 A Yes, so?

22 Q And I'm asking you now, do you have any facts  
23 to contend that this is no longer the case as it always had  
24 been in your experience that such documents are subject to the  
25 joint control of either Mr. or Mrs. Hubbard?

26 A None other than what I've stated.

27 Q When you say none other than what you have stated,  
28 what are you referring to? The conversation with Laurel

1 Sullivan?

2 A Yes.

3 Q Nothing else?

4 A No.

5 MR. LITT: Okay. Let's stop.

6 MS. DRAGOJEVIC: Off the record.

7 (Off the record.)

8 MR. LITT: I would propose a stipulation whereby the  
9 transcript of the deposition can be signed under -- I assume  
10 you want to have it reviewed and signed?

11 MS. DRAGOJEVIC: Yes.

12 MR. LITT: It's fine with me to have it signed under  
13 a declaration of penalty of perjury and not notarized; and  
14 obviously the normal objections are reserved -- this goes with-  
15 out saying. I don't have anything other than that. And how  
16 long do you need?

17 MS. DRAGOJEVIC: Well, 60 days.

18 MR. LITT: 60? No, come on.

19 MS. DRAGOJEVIC: It's the usual amount of time I always  
20 request.

21 MR. LITT: Is there any reason why? Mr. Armstrong is  
22 readily available. Is there any reason why 30 days is too  
23 much? Here's the thing: as you know, we are going to go in  
24 to modify the preliminary injunction. We intend to use the  
25 deposition in that. I assume that you will object to that in  
26 part because you haven't had an opportunity to review it. If  
27 the court agrees with that and therefore wants to put off  
28 resolving that matter until you have had the opportunity to



1 review it, I don't want to be in a position where it's going to  
2 take 60 days to do that. 30 days should be ample under the  
3 circumstances.

4 MS. DRAGOJEVIC: All right. 30 days is fine.

5 MR. LITT: Corrections in the form of an errata sheet  
6 under penalty of perjury.

7 MS. DRAGOJEVIC: Fine. And if no corrections or addi-  
8 tions or deletions are made by the time of trial, then a copy  
9 can be used in lieu of the original for all purposes.

10 MR. LITT: By the time of trial?

11 MS. DRAGOJEVIC: Yes.

12 MR. LITT: Are you contemplating making corrections  
13 after it's signed?

14 MS. DRAGOJEVIC: No.

15 MR. LITT: Well, normally we have a 30-day signature  
16 period. Normally the errata sheet would be submitted at the  
17 same time as the signature.

18 MS. DRAGOJEVIC: Yes. I'm talking about using a copy  
19 in case he doesn't get to sign it.

20 MR. LITT: Okay.

21 MS. DRAGOJEVIC: Could we go off the record for a minute

22 (Off the record.)

23 MS. DRAGOJEVIC: Why don't we relieve the court reporter  
24 of her responsibilities under the Code of Civil Procedure; the  
25 original of the deposition will come to my office for safe-  
26 keeping and signature by the witness under penalty of perjury;  
27 that if the original is not signed by the time of trial or  
28 arbitration of this matter, that a copy can be used in lieu

1 for all purposes; and that we will have 30 days in which to  
2 review and sign the deposition transcript.

3 MR. LITT: Why? Are you planning to give me the  
4 original?

5 MS. DRAGOJEVIC: No. I'm letting you order a copy.

6 MR. LITT: You don't get to keep the original unless  
7 you pay for it. It's mine. Sorry about that. If I pay for  
8 it, it's my copy.

9 MS. DRAGOJEVIC: Well, my experience is that we get the  
10 original.

11 MR. LITT: No, not unless you pay for it. I get the  
12 original. If you want the original, you pay for it; otherwise,  
13 the original comes to me in 30 days from the time of your  
14 receipt. If you want to pay for the original, that's fine;  
15 you get to keep it.

16 MS. DRAGOJEVIC: Well, why don't we decide that at a  
17 later point. The original can go to you for the time being.

18 MR. LITT: You can send the original to Ms. Dragojevic.

19 MS. DRAGOJEVIC: That's what I wanted.

20 MR. LITT: She can send it to you, but I want the  
21 original returned to me.

22 MS. DRAGOJEVIC: Well, all right. The original will  
23 be initially sent to my office.

24 (The deposition proceedings were adjourned  
25 at 5:58 P.M.)  
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STATE OF CALIFORNIA                    )  
  ) ss.  
COUNTY OF LOS ANGELES                )

I, GERALD ARMSTRONG, having appeared for my deposition on January 14, 1983, do hereby declare under penalty of perjury that I have read the foregoing deposition, I have made any corrections, additions, or deletions that I was desirous of making in order to render the within transcript true and correct, and

IN WITNESS WHEREOF, I have hereunto subscribed my name this            day of                               , 1983.

\_\_\_\_\_  
GERALD ARMSTRONG

1 STATE OF CALIFORNIA )  
2 ) ss.  
3 COUNTY OF LOS ANGELES )

4 I, RUTH PERSKY, C.S.R., #5673,  
5 a Notary Public in and for the County of Los Angeles, State  
6 of California, do hereby certify:

7 That prior to being examined, the witness named in the  
8 foregoing deposition, GERALD ARMSTRONG,  
9 was by me duly sworn to testify the truth, the whole truth  
10 and nothing but the truth.

11 That said deposition was taken before me at the time  
12 and place therein set forth and was taken down by me in  
13 shorthand and thereafter transcribed into typewriting under  
14 my direction and supervision, and I hereby certify the  
15 foregoing deposition is a full, true and correct transcript  
16 of my shorthand notes so taken.

17 I further certify that I am neither counsel for nor  
18 related to any party to said action nor in anywise interested  
19 in the outcome thereof.

20 IN WITNESS WHEREOF, I have hereunto subscribed my  
21 name and affixed my official seal this 18<sup>th</sup> day of  
22 January, 1983.

23  
24 Ruth Persky  
25 Notary Public in and for the County  
26 of Los Angeles, State of California



EX 1

G. Armstrong  
P.O. Box 1173  
Costa Mesa, CA 92627

REMAILED  
NOT IN REGISTER

Mrs. L.R. Hubbard  
~~1532 A North La Brea Ave, Suite 100~~  
~~Los Angeles, CA 90028~~

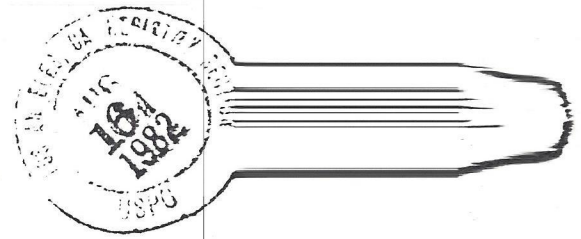
EXHIBIT  
FOR IDENTIFICATION  
RUTH PERCKY, CSR #5673  
NOTARY PUBLIC

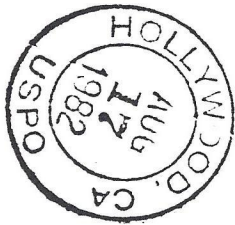
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EX 1

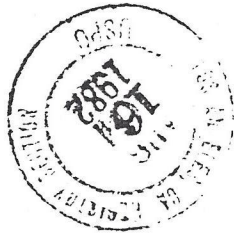
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